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ABSTRACT

This accreditation user guide describes: (1) a set of institutional conditions, policies, and practices that are potentially abusive to students, and (2) a system for collecting, analyzing, and using quantitative data on these conditions, policies, and practices. Possible uses include: (1) setting consumer protection standards and goals that institutions should meet to gain or keep accreditation, and (2) establishing an institutional self-reporting system that could be the basis for periodic self-evaluations and possibly central reporting. The core of this self-reporting system is the Institutional Report Form (IRF), with two separate versions for degree-granting and occupational training institutions. The 13 topics of the IRF are: refund policies and practices; advertising policies and practices; admission practices; instructional staff evaluation practices; disclosure in written documents; student orientation practices; job placement services and follow-up of graduates; recordkeeping practices; maintaining instruction staff stability; representation of current approved or accredited status; financial stability; occupational instruction programs and equipment and facilities. (LBH)

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# SYSTEM FOR COLLECTING, ANALYZING, AND USING INFORMATION ON INSTITUTIONAL CONSUMER PROTECTION PRACTICES: ACCREDITATION USER GUIDE

## IMPROVING THE CONSUMER PROTECTION FUNCTION IN POSTSECONDARY EDUCATION

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# SYSTEM FOR COLLECTING, ANALYZING, AND USING INFORMATION ON INSTITUTIONAL CONSUMER PROTECTION PRACTICES: ACCREDITATION USER GUIDE

## General Introduction

### Background

Private, non-governmental accreditation of postsecondary institutions plays an important role in protecting students from educational malpractice. This role is an apparently inseparable part of one of accreditation's major purposes, which is to certify that an accredited institution has met established standards of educational quality, in accordance with its stated educational goals. It is difficult to see how an institution with valid educational goals could provide a "quality" program in the absence of proper safeguards to protect students from such abuses as: fraudulent or misleading advertising and recruiting techniques; lack of full disclosure of salient information about institution conditions, practices, and policies which affect students; inadequate student services, including student orientation, job placement, and maintenance of proper records; inferior facilities, course offerings, and instructional staff; and financial instability.

The U.S. Office of Education (USOE) is especially concerned about accreditation's role in postsecondary student consumer protection, because institutional accreditation[1] is normally a corequisite for institutional eligibility to participate in Federal programs of financial assistance to

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[1] It should be noted at the outset that the authors discriminate between "institutional" accreditation, which normally applies to an entire educational institution, and "specialized" or "program" accreditation, which normally applies to programs, departments, or other units which offer specialized educational services within an institution. This user guide is directed toward institutional accreditation agencies only, except in cases where specialized accreditation agencies accredit an entire institution, by virtue of that institution's devotion to a single educational program.

students. As part of this Congressionally-mandated role, USOE periodically publishes a list of "nationally recognized" accreditation agencies which have been evaluated by the U.S. Commissioner of Education and found to be "reliable authorities as to the quality of training offered."[1] The origins and growth of the Commissioner's evaluation process, with its criteria for recognition of accreditation agencies, have been adequately described elsewhere (Chapters C and D of Orlans, Levin, Bauer, & Arnstein, 1975; and Brown, 1975) and will not be discussed here. The most recent recognition criteria, as published in the Federal Register of August 20, 1975, contain sections on the following characteristics of a "recognized" accreditation agency: functional aspects (is national or regional in scope of operations, has sufficient organizational capability, utilizes proper procedures, etc.); responsibility (meets clearly defined needs, is responsive to the public interest, assures due process, etc.); reliability (has been in operation not less than two years, conducts regular review of its standards, policies, and procedures, etc.); and autonomy (can exercise independent judgment, is free from conflict of interest). The criteria are applied and agency recognition/limitation/termination recommendations are made to the Commissioner by an Advisory Committee on Accreditation and Institutional Eligibility through the Division of Eligibility and Agency Evaluation (DEAE), Bureau of Postsecondary Education.

A number of well-publicized institutional abuses of students who were beneficiaries of federal assistance programs (e.g., Pugsley & Hardman, 1975; U.S. Congress, 1974a, 1974b; Jung, Hamilton, Helliwell, McBain & Fernandes, 1975; Federal Trade Commission, 1974) has placed increasing pressure on DEAE to tighten its evaluation criteria for recognized accreditation agencies. The Division currently requires a recognized agency, or agency seeking recognition,

[1] From 20 U.S.C. 1141 (a).

to "demonstrate the capability and willingness to foster ethical practices among the institutions or programs which it accredits...."[1] Although it fell short of stringent recognition standards proposed in a bill authored by Representatives Bell and Pettis (1975), recent language proposed by USOE for inclusion in the Education Amendments of 1976 (Proffitt, 1976) would have required the addition of more stringent regulations by adding the words "and the probity of the institutions or schools offering such training" to the "reliable authority as to the quality of training" clause already cited from 20 U.S.C. 1141 (a). This additional language was opposed by some members of the accreditation community (c.f., Young, 1976) because they saw in it the implication that accreditation agencies should "function in effect, as an arm of the government -- policing institutional adherence to federal... mandated requirements in such areas as...consumer protection...."[2] Much of USOE's proposed language was ultimately dropped from the 1976 Education Amendments which won passage, but disagreement remains about the degree to which the government should require accreditation agencies to enforce more stringent student consumer protection standards.

The agencies which accredit proprietary (incorporated as profit-seeking) institutions[3] are more active in the area of student consumer protection than are the regional agencies which accredit private non-profit and public institutions. For example, the "ethical practices" standards of proprietary school

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[1] From Title 45, Chapter 1, Section 149.6 (b) (4), Federal Regulations, under the criteria on agency responsibility.

[2] Accreditation newsletter, Council on Postsecondary Accreditation, September 1975, 1 (1), 1.

[3] which, by law, are eligible to participate in some federal assistance programs, including the Guaranteed Student Loan Program and the Basic Educational Opportunity Grant Program. Proprietary programs and courses are also eligible to enroll veterans who receive educational benefits under the G.I. Bill.

accreditation agencies such as the National Association of Trade and Technical Schools, Association of Independent Schools and Colleges, and National Home Study Council all contain over 10 pages of prohibitions and requirements on such topics as advertising and recruiting, tuition refunds, and disclosure of material facts. In contrast, the ethical practice standards of regional accreditation agencies rarely exceed one page. Greater activity in the proprietary accrediting sector may be a reaction to the fact that most recorded abuses of student consumers have occurred in proprietary schools (see Helliwell & Jung, 1975). It may also be a partial result of the fact that most proprietary schools offer training specifically geared toward immediate occupational preparation, while the goals of non-proprietary higher education institutions are much less specific in fostering student expectations of post-educational job opportunities. However, with recently declining enrollments and the concurrent growth of non-traditional programs, public and private non-profit institutions have received more attention (e.g., Orlans, et al., 1974, Chapter G), and incidents of failure to grant partial refunds, misleading advertising and recruiting practices, and lack of minimally adequate disclosure have provided convincing evidence that proprietary schools are not the sole perpetrators of student consumer abuses. The issue of consumer protection in accredited institutions exists regardless of whether the institutions are proprietary or non-proprietary or have occupational or non-occupational educational goals.

As was mentioned earlier, accreditation by a USOE-recognized accreditation agency is <u>not</u> tantamount to institutional eligibility, even though this fact is occasionally lost by some commentators (e.g., Orlans, et al., 1974). In addition to private accreditation, the so-called "tripartite" system of institutional eligibility for USOE-administered financial assistance programs also requires: (1) <u>state</u> authorization and (2) compliance with the assistance

program regulations established by USOE. As outlined by Kaplin (1975), the state-level "partners" in this system have direct governance responsibility over postsecondary institutions, and, as a result, can play a major role in preventing and punishing cases of student abuse by institutions, whether or not these institutions are eligible for federal funds. Even though the Education Commission of the States has proposed Model State Legislation (ECS, 1973) and even though there is evidence that state regulatory agencies are more active in this area than has been assumed (National Association of State Administrators and Supervisors of Private Schools, undated), there is general agreement that state laws and enforcement mechanisms are still of uneven effectiveness in protecting students from institutional abuse.[1]

USOE has also moved to strengthen its own regulations for the Guaranteed Student Loan Program (GSLP), placing tighter restrictions on loan disbursement practices and requiring institution officials to sign a Terms of Agreement document obligating them to make good faith efforts to inform prospective students about the institution's program, facilities, faculty, and, for occupational training programs, employment and earnings data on graduates (USOE, 1975). Non-compliance with these regulations is punishable by limitation, suspension, or termination of eligibility for the GSLP. Institutional eligibility regulations for all financial assistance programs authorized under Title IV of the Higher Education Act are likely to be tightened under the Higher Education Act Amendments of 1976. Historically, however, USOE has favored a policy of attempting to strengthen the function of state authorizing and accreditation to provide improved student consumer protection at the postsecondary level (Herrell, 1974), and DEAE continues to refer the vast majority of student complaints it receives about accredited institutions to the accred-

[1]More detailed information on the effectiveness of state-level oversight with respect to student consumer protection will be available in 1977 from a USOE-sponsored research study (see Hamilton, Jung, Helliwell, & Wheeler, 1976).

iting agency involved, although school visits may occasionally be undertaken (Pugsley & Hardman, 1975).

Purpose of this Guide

As the tripartite system partner with the clearest role in assessing institutional quality, it would seem that accreditation does have a major interest in obtaining information on the consumer protection policies and practices of postsecondary institutions, whether or not this interest is dictated by federal law. The purpose of this guide is to describe: (1) a set of institutional conditions, policies, and practices which are potentially abusive to students and (2) a system for collecting, analyzing, and using quantitative data on these conditions, policies, and practices. Possible uses include: (1) setting consumer protection standards and goals which institutions should meet in order to gain or keep accreditation and (2) establishing an institutional self-reporting system which could be the basis for periodic self-evaluations and possibly central reporting to the other, governmental, members of the tripartite eligibility system (i.e., states and the Federal government).

The core of this self-reporting system is the Institutional Report Form (IRF), with two separate versions for degree-granting and occupational training institutions. It is a relatively simple 13-topic, 53-item questionnaire that can be completed by a knowledgeable institutional official in less than two hours. Although some items require partial subjective judgements in their making, most items represent objective determinations that "this institution does it/doesn't do it" or "has it/doesn't have it." The 13 topics are:

1. Refund Policies and Practices
2. Advertising Policies and Practices
3. Admissions Practices

4. Instructional Staff Evaluation Practices

5. Disclosure in Written Documents

6. Student Orientation Practices

7. Job Placement Services and Follow-up of Graduates

8. Recordkeeping Practices

9. Maintaining Instruction Staff Stability

10. Representation of Current Approved or Accredited Status

11. Financial Stability

12. Occupational Instruction Programs[1]

13. Occupational Instruction Equipment and Facilities[1]

The critical requirements for each item on the IRF are:

- it relates well to an institutional practice or policy which is generally agreed to be abusive (or the absence of which is generally agreed to be abusive) to students;
- it clearly indicates what practices are undesirable, with no complex statistical transformations required;
- it can be weighted, such that quantifiable scores can be produced for each of the 13 topics;
- it can be verified, either through easily accessible documentation or alternate information sources;
- it can be marked without imposing an unreasonable burden on either the source institution or the collecting agency;
- it taps policies and practices which are modifiable and within the power of every institution to modify; and
- it is at least potentially useful to an institution in its own self-study and self-improvement efforts.

As a result of these requirements, items on minimum acceptable levels of school dropout rate, withdrawal rate, and/or graduate placement rate are specifically not included. It seems clear that such rates, even if they could be calculated accurately and at reasonable cost, are very difficult to interpret

[1]These topics are contained in the IRFs for occupational training institutions only.

meaningfully. For example, there is no evidence to support the deceptively simple hypothesis that abusive institutions have higher dropout and default rates or lower placement rates than non-abusive institutions. The evidence that is available does suggest that dropout, default, and placement are much more a function of the socio-economic status, initial employment status, motivation, and employability of entering students. These variables are <u>not</u> within the power of an institution to control, unless it uses discrminatory admissions standards which are generally considered unacceptable and even unlawful.

In addition to the 13-topic questionnaire , the system consists of a set of data coding, keypunching, analyzing, and reporting specifications, including field tested and extensively documented computer programs suitable for immediate implementation of the possible accreditation uses to be explained in detail in the final section of this guide.

## Collecting Information on Institutional Consumer Protection Policies and Practices

### Definition of Educational Consumer Protection

In an effort to define precisely the nature of student consumer abuse, AIR staff undertook a comprehensive search of the literature, which included: (1) the records of hearings conducted by subcommittees of the U.S. House of Representatives Committee on Education and Labor and Committee on Government Operations; (2) reports published by the Education Commission of the States as a result of two national conferences on student consumer protection; (3) a report published by USOE as a result of a national conference on institutional eligibility; (4) the 40+ volume file put together by the staff of the Federal Trade Commission in support of their proposed trade regulation rule for proprietary vocational and home study schools; (5) the student complaint files of USOE's Accreditation and Institutional Eligibility Staff (now DEAE); and over 60 other sources (see Helliwell & Jung, 1975). In general, we were seeking to identify institutional policies and practices which had the potential to mislead students and frustrate their efforts to obtain an education. We made several decisions which should be made explicit here.

Students are consumers. Some authors (e.g., Enteman, 1975) have attempted to contend that students, as participants in the educational process, are not "consumers" in the true sense of that word. While we do believe that a good deal of the responsibility for learning during any educational experience rests with the student, it is clear that some school practices deprive the student of even an opportunity to learn; furthermore, some practices are so blatantly fraudulent and unfair that they would be abusive regardless of the product or service that was being offered. To the extent that schools do market an educational service, students are clearly the consumers.

Consumer protection is unequal to better educational decision making. Numerous calls have been registered for systems to assist students in making better decisions about postsecondary education. Such calls usually include requests for disclosure of better information on the course options, social climate, financial aid, etc. available at an institution, plus providing students with an insight into the world of work and the student's own goals, interests, abilities, limitations, etc. Information of this type is no doubt an aid to student decision making. However, such information is not the same as information about institutional practices which abuse students. The limited set of information useful for providing better "student consumer protection" should be carefully distinguished from the much larger set required to facilitate "better student decision making;" we feel this distinction can help avoid much unnecessary confusion and effort.

The major kinds of consumer abuse. Appendix A presents a list of potentially abusive institutional practices categorized according to the 13 topics listed on page 7 of this guide. Admittedly there is a thin line between "sharp" business operations or unintentional oversight and educational malpractice. Practices which are illegal in one state may be perfectly legal in the neighboring state. The listed practices are those which clearly: (1) are designed to mislead students; (2) endanger students' opportunity to receive the promised educational services; or (3) deny students proper recourse. There are no doubt other potentially abusive practices, and in the course of our literature review we discovered many of them. The ones listed in Appendix A were chosen because they represented, in our judgment, the set that was most dangerous to students receiving federal aid and most easily detectable without recourse to: (1) excessive subjectivity (e.g., without attempting to define and measure "poor moral character of administrators"), or (2) excessive expense (e.g., without requiring schools to carry out costly data collection

and tabulation efforts to calculate rates of "training-related" job success of graduates or buy costly performance or surety bonds).

The converse of the abuses listed in Appendix A constitutes our operational definition of educational consumer protection...institutional policies and practices which: (1) provide disclosure of salient facts; (2) safeguard students' opportunity to receive promised educational services; and (3) provide students with proper recourse.

The Institutional Report Forms

Two IRFs have been designed to collect information from degree-granting and occupational training institutions about the potentially abusive practices listed in Appendix A. In all cases, the IRF items have been selected according to the critical requirements listed on pages 7 and 8 of this guide. A "yes/no/not applicable" response format has been adopted for all except two items (on instructional staff stability), which require the entering of a number and a percent. The IRFs are structured as questionnaires to be completed and certified as accurate by institutional administrators themselves or by accreditation team members during an accreditation site visit. IRF completion requires examination of certain institutional policy statements, records, and public dissemination and disclosure materials. The completion process requires from one to three hours, depending on the obtained responses.

Appendix B contains the basic IRF for Postsecondary Occupational Training Institutions. Appendix C contains modifications to the occupational IRF which make it more appropriate for degree-granting institutions. These appendices also contain a brief discussion of the purpose of each of the 13 topics and detailed instructions for marking each item.

The occupational IRF (Appendix B) should be used for any institution which offers terminal occupational programs of postsecondary education. If the institution also offers transfer-oriented programs or degrees in association with

its occupational programs (e.g., the A.A. or A.S. degree), the occupational IRF is still appropriate. If the institution offers only a program of higher education leading to baccalaureate or graduate degrees, the degree-granting IRF (Appendix C) is appropriate.

Whenever possible, each item in the IRF should be marked; an attempt has been made to provide "Not Applicable" response options in each case where an item might prove inappropriate for an institution of limited size or educational purpose. These options should always be used in preference to omitting an item. Missing responses can prove to be very troublesome during the analysis of IRF data, to be discussed in the next section.

## Analyzing Data on Institutional Consumer Protection Policies and Practices

The data analysis specifications for the IRF have been formulated to accomplish the following steps for each institution which is being assessed: (1) convert the hand marked responses in the questionnaires (Appendices B and C) into coded, computer processable data; (2) weight these data, by hand or by computer, according to the seriousness of each response as an indicator of potential consumer abuse; (3) produce summary weighted scores for each of the 13 topics on the IRF[1] and overall institution score (these are called Topic Scores and the Institution Score, respectively); and (4) provide for the verification of these scores, and their correction in the event of data processing errors.

These analysis specifications allow for both hand processing and computer processing; for individual institution self-analysis, hand processing is sufficient; for processing a larger number of IRFs at one time, computer processing is more efficient. The break-even point (that point at which computer processing will probably be cheaper and more efficient than hand processing) is approximately 50 institutions per year.

It is not possible for the authors of this guide to predict the type of electronic data processing equipment which will be available to any particular user of the IRF system. In discussing computer processing specifications, we have therefore chosen to avoid equipment-specific terminology and use generic names where possible.

### Coding and Editing the IRF Data

For computer processing, IRF responses are coded by keytaping or by direct data entry through a remote terminal. Appendix D contains the speci-

[1] Only 11 topics are included on the Degree-Granting IRF (see Appendix C).

fications and instructions for coding and editing IRF data for input into the weighting computer program described in the next section. If keytaping is used, we have assumed a 120 byte record length. Because each IRF record requires 172 bytes, two records are required under this option. Column 2 of Appendix D contains the length in bytes of each item; column 3 contains the sequential byte location for each item under the keytaping option; and column 4 contains the sequential byte location for each item under the direct data entry option or for the merged record under the keytaping option. It is essential that these data locations be maintained exactly in order to preserve the accuracy of the weighted data to be produced by the computer program. In general, we have adopted a system of coding '0' for NO answers, '1' for YES answers, '8' for not applicable responses, and '9' for missing data. These instructions are contained in column 5 of Appendix D. All coding should be routinely verified, and a frequency distribution of the coded data should be created and inspected for out-of-range numbers.

Editing can be done either before the IRFs are coded or during the coding operation. Editing is the process of inspecting for directed omissions, missing data, etc. to insure that they are coded according to the specifications in column 5 of Appendix D.

Weighting the Coded IRF Data

IRF responses are weighted according to the severity of the potential institutional abuse they reveal. The weighting procedure is an essential part of the IRF-processing system, because any attempt to quantify the adequacy of an institution's consumer protection policies and practices requires that allowances be made to discriminate between major and minor potential abuses.

The IRF weighted score is somewhat like a golf score. The higher the score, the worse the performance. Each revealed potential for abuse adds weighted points; the greater the potential for abuse, the more points. An

institution's overall score is the sum of all its points, and the higher the score, the more likely students are to encounter abuse.[1] Topic scores are the similarly summed points for each of the 13[2] topics on the IRF. Appendix D (column 6) contains the weights to be applied to each item on the IRF.

A computer program written in the PL/1 language performs the mechanical operations of taking the coded IRF responses as input and producing the weighted Topic and Institution Scores as output. This printed output is identified according to an 11 digit school ID number, which can be modified as necessary according to the unique needs of the user. Each school, however, must have some similar unique designator, since the program is designed to process a large number of IRFs at one time. A program listing is included as Appendix E.

For computer processing, it is always wise to routinely weight a randomly selected 5% sample of IRFs by hand and compare the hand-calculated results with those produced by the computer to verify the accuracy of the scores.

Interpreting Topic and Institution Scores

An institution may achieve a "perfect" zero Institution Score or Topic Score on the IRF by not having any weighted responses marked. This situation is rare. In a 37 institution field test[3] of the IRFs, Institution Scores ranged from 90 to 430. The worst possible Institution Score is 1150. Table 1 contains a summary of the maximum (worst possible) weighted Topic Scores for each topic.

Average Institution Scores obtained by various types of institutions in the field test are presented in Figure 1. This figure represents

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[1] Scores are actually averages, calculated on the basis of all IRF items which are marked; this averaging is necessary to correct for the influence of missing data (i.e., omitted responses). It is useful, however, to consider the IRF weighted scores a sum.

[2] Only 11 topics are included on the Degree-Granting IRF.

[3] For a description of this field test, see the final project technical report (Jung, Hamilton, Helliwell, Gross, Bloom, Shearer, & McBain, 1976).

a primitive set of norms against which newly-obtained IRF scores may be compared. As experience with the use of the system expands, more representative norms will no doubt emerge.

Table 1

Maximum Possible IRF Weighted Scores

| Topic Score | Occupational | Degree-Granting |
|---|---|---|
| 1. (Refund Pract.) | 1000 | 1000 |
| 2. (Advertising Pract.) | 1450 | 1450 |
| 3. (Admissions Pract.) | 1090 | 1090 |
| 4. (Inst. Staff Eval.) | 1130 | 1130 |
| 5. (Written Disclosure) | 650 | 640 |
| 6. (Student Orient.) | 800 | 800 |
| 7. (Job Placement) | 1180 | 1180 |
| 8. (Recordkeeping) | 1330 | 1330 |
| 9. (Staff Stability) | 2500 | 2500 |
| 10. (Status Represent.) | 1500 | 1500 |
| 11. (Financial Stability) | 2140 | 2140 |
| 12. (Inst. Programs) | 1880 | N.A. |
| 13. (Inst. Facilities) | 1500 | N.A. |
| Institution Score | 1150 | 1070 |

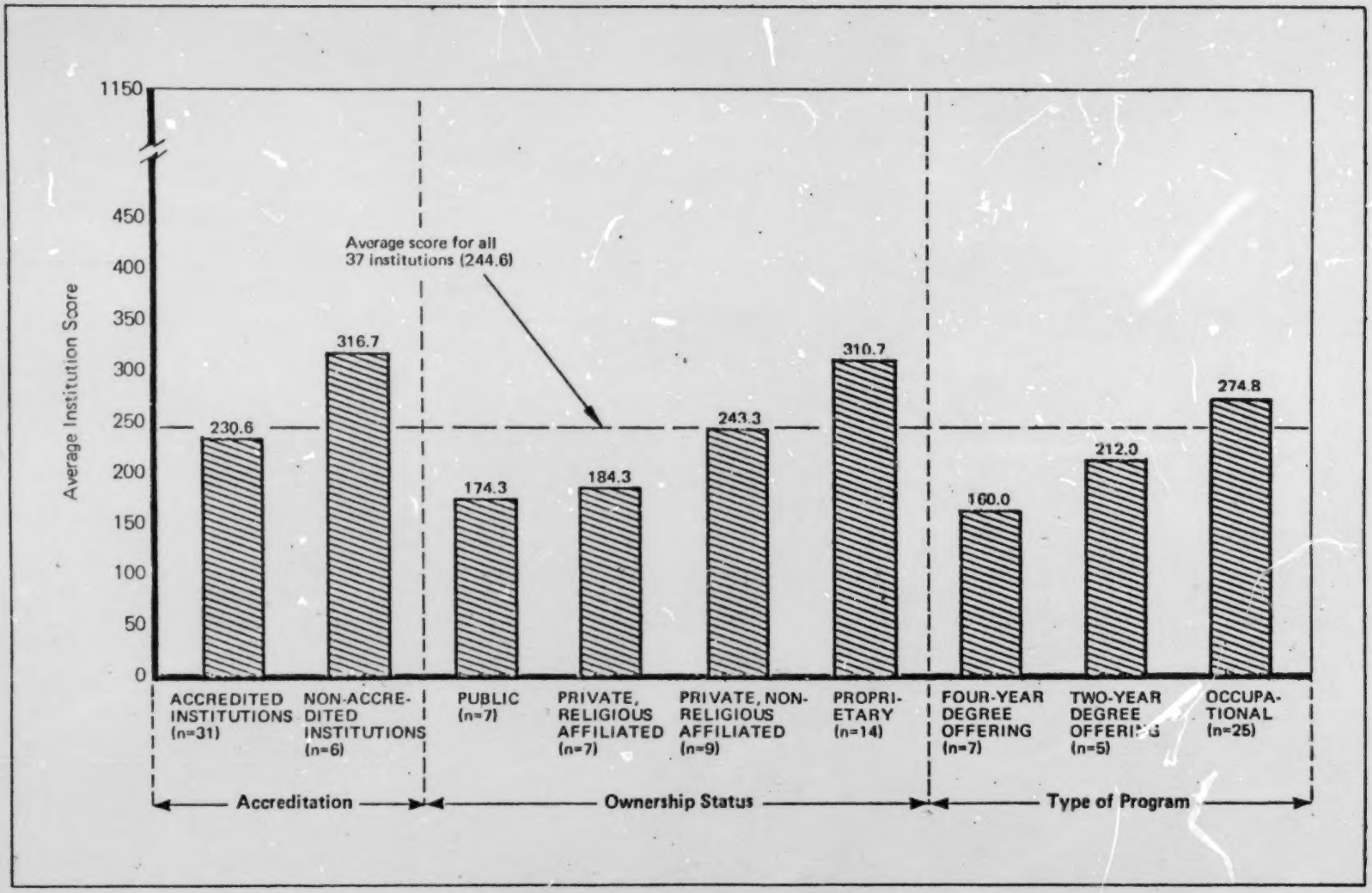


FIGURE 1 - AVERAGE IRF FIELD TEST SCORES SHOWING DIFFERENCES BY ACCREDITATION, OWNERSHIP STATUS, AND TYPE OF PROGRAM

## Applications of the IRF System

The examples cited on the following pages are, in the judgment of AIR staff, practical applications of the IRF system, i.e., applications which can (and should) be undertaken by accreditation users. Where mention is made of existing norms (i.e., comparison bases for estimating the relative magnitude of an IRF item response, Topic Score, and/or Institution Score), the reference is always to the 37 institution field test of the IRF system conducted by AIR in three states during early 1976. Field test data are contained in the final project technical report (Jung, et al., 1976).

### The Self-Study and Verification

The institutional self-study has become a primary aspect of the accreditation process. In general, the self-study precedes a site visit by a team of peer educators who carry out an actual institutional evaluation to verify the self-study. The decision to award, limit, or withhold accreditation is largely based on the self-study, its on-site verification, and the recommendations of the site visit team. The self-study may be carried out by administrators, faculty, or students of an institution, or a combination of these. For higher education institutions, it normally includes inquiries into the following aspects of institutional organization and functioning:

1. Goals and Objectives
2. Educational Program/Curriculum
3. Faculty and Staff
4. Student Services
5. Public Services and Off-Campus Programs
6. Library and Other Learning Resources
7. Physical Plant and Equipment
8. Financial Resources

9. Institutional Governance and Administration

10. Research

11. Graduate Programs, if any

For occupational training institutions, points 10 and 11 above are usually omitted. As previously mentioned, proprietary school accrediting agencies may add inquiries into aspects such as advertising and promotional literature, recruiting and admissions practices, refund policies, and disclosure (catalog) requirements, often under the rubric "ethical standards."

The IRF can be integrated into this self-study process in a number of ways. Probably the easiest way would be to include the basic form (Appendices B and C) in the self-study "manual" which is normally given to institutions applying for accreditation or reaccreditation. Depending on the type of self-study process chosen by the institution, the IRF could then be completed by administrators, faculty, and/or students. The findings could serve as the basis for voluntary improvements on the part of the institution to correct potential abuses prior to the site visit. Especially interesting would be cases where the self-study IRF scores obtained from different segments of the school's staff or student body differed significantly, indicating lack of awareness of specific policies, practices, and/or conditions in one or more quarters. In any case, the data could be reported in the self-study document, perhaps as a separate topic area entitled "Student Consumer Protection." Under this option, the task of the accreditation team members would be to verify the reported data, based upon their own observations and interviews. As with all accreditation team reports, the results of this verification would be shared at the end of the visit with the school representatives and later with the accreditation agency's decision-making body. The results would not have to be made public; disclosure would be at the option of the agency.

Periodic Accreditation Agency Monitoring and Sharing

Accredited institutions normally are required to submit annual or other reports to their accreditation agency during the interim period between reaccreditation visits.[1] These reports often consist of nothing more than financial statements or subjective status assessments. We believe the value of these periodic reports could be significantly enhanced by adding the IRF to periodic reporting requirements. The form could be completed by institutional officials and submitted to the accreditation agency on an annual or semi-annual basis. There the IRFs from all institutions could be centrally processed and maintained in a central repository. For institutions whose Institution Scores exceeded a given level (e.g., the 75th percentile), special contacts could be instituted by the accreditation agency to obtain verification and explanation if the score proved accurate.

The IRF scores could also identify institutions with very low scores which are doing an exceptionally good job in protecting their students from abuse. Their experience could be instructive to other institutions which are seeking to bring about improvements in their own policies and practices. Such identification could also serve as a form of reward for institutions, and consideration could be made by accreditation agencies for public recognition or other positive incentives.

Finally, accreditation agencies could give consideration to sharing IRF scores with the governmental partners in the tripartite eligibility system who make decisions based on the accredited status of an institution. Jung et al. (1976, pp. 73-74) recommended that USOE should sponsor an Annual Working Conference for representatives of the tripartite system to develop a system of mutual communications based on sharing data, such as IRF scores, which

[1] The length of this interim period depends on the accreditation status of the institution; normally, it varies between four and five years, although it may be as short as one year or as long as ten years.

would be unique to one of the partners but useful to the others in making decisions which are confined to their own sphere of influence. An advantage of IRF scores as one subject for such sharing is that they are relatively objective and standardized in their meaning. They are therefore not dependent on the inconsistent definitions, practices, regulations, etc. of any one agency or partner in the tripartite system.

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APPENDIX A

Categories and Examples of Potentially Abusive

Institutional Policies and Practices

A. Refund Policies and Practices

1. Institution does not have a written refund policy for fees or charges collected or obligated in advance of enrollment or class attendance.

2. Written refund policy is not publicly disseminated to students and prospective students.

3. Written refund policy does not tell students how to obtain refunds.

4. Written refund policy does not provide for at least partial return of student fees or charges based on the amount of instruction the student has had the opportunity to receive.

5. Written refund policy does not specify the maximum time allowed between the receipt of a valid refund request and the issuance of a refund.

B. Advertising Practices

1. Institution uses:

(a) advertisements in "help wanted" section of newspapers, pseudo "Talent" contests;

(b) testimonials or endorsements by actors who did not attend the institution; or

(c) limited time "discounts," to attract enrollees.

2. Advertising of the institution guarantees or implies that completion of an education or training program will lead to employment.

3. Institution's advertising implies that it:

(a) has special ties or connections with employers which it does not in fact have;

(b) offers full or partial scholarships when in fact it offers only loans or deferred tuition;

(c) has recognized experts on its teaching faculty who in fact have no teaching responsibilities; or

(d) offers a "superior" educational program when in fact there is no comparative evidence to support the assertion.

C. Admission Practices

1. Institution employs admissions representatives whose compensation or salary is dependent wholly or in part on direct commissions based on number of students enrolled.

2. Institution does not have a written policy governing recruiting and/or admission practices.

3. Written recruiting/admissions policy does not contain:

   (a) any prohibitions against unethical practices such as the "bait and switch" or the "negative sell";

   (b) a requirement that all prospective students talk to a representative of the institution at the school prior to enrolling; or

   (c) a requirement that all enrollees sign an agreement which describes complete costs, payment requirements, and educational services to be provided by the institution.

4. Institution does not provide remedial instruction in basic skills for students who are admitted without meeting stated admissions requirements.

D. Instructional Staff Evaluation Policies

1. Teaching competence is not included as one criterion in formal salary and/or tenure and/or rank review policies.

2. Evaluations of teaching competence do not include regular, anonymous ratings by students.

E. Disclosure in Written Documents

1. Failure to disclose any of the following in a general catalog, bulletin, or other basic information document:

   (a) name and address of school.

   (b) date of publication of the document.

   (c) school calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.

   (d) a statement of institutional philosophy.

   (e) a brief description of the school's physical facilities.

   (f) an accurate list of all courses actually offered.

   (g) an indication of when specific required courses will <u>not</u> be offered.

   (h) educational content of each course.

   (i) number of hours of instruction in each course and length of time in hours, weeks or months normally required for its completion.

(j) an accurate listing of faculty who currently teach.

(k) an indication of the distinction between adjunct or part-time faculty and full-time faculty.

(l) policies and procedures regarding acceptability of credits from other institutions.

(m) general acceptability by other institutions of credits earned at this institution.

(n) requirements for graduation.

(o) statement of certificates, diplomas, or degrees awarded upon graduation.

(p) statement of all charges for which a student may be held responsible.

(q) financial aid programs actually available to students.

(r) limitations on eligibility for financial aid programs.

(s) grading system.

(t) policies relating to:

(1) tardiness
(2) absences
(3) make-up work
(4) student conduct
(5) termination
(6) re-entry after termination

(u) student fee increases in excess of $25 that are planned within the next year.

(v) for student loan applicants:

(1) the effective annual loan interest rate
(2) loan repayment obligations
(3) loan repayment procedures
(4) time allowed for repayment
(5) deferment or cancellation provisions, if any
(6) collection procedures which might be applied in the event of failure to repay

2. In the event any of the following services or facilities are provided, failure to disclose their actual availability and extent:

(a) Job placement assistance or service.

(b) counseling, including for employment, academic, and/or personal problems.

(c) dining facilities.

(d) housing facilities.

(e) student parking facilities.

C. Admission Practices

1. Institution employs admissions representatives whose compensation or salary is dependent wholly or in part on direct commissions based on number of students enrolled.

2. Institution does not have a written policy governing recruiting and/or admission practices.

3. Written recruiting/admissions policy does not contain:

   (a) any prohibitions against unethical practices such as the "bait and switch" or the "negative sell";

   (b) a requirement that all prospective students talk to a representative of the institution at the school prior to enrolling; or

   (c) a requirement that all enrollees sign an agreement which describes complete costs, payment requirements, and educational services to be provided by the institution.

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D. Instructional Staff Evaluation Policies

1. Teaching competence is not included as one criterion in formal salary and/or tenure and/or rank review policies.

2. Evaluations of teaching competence do not include regular, anonymous ratings by students.

E. Disclosure in Written Documents

1. Failure to disclose any of the following in a general catalog, bulletin, or other basic information document:

   (a) name and address of school.

   (b) date of publication of the document.

   (c) school calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.

   (d) a statement of institutional philosophy.

   (e) a brief description of the school's physical facilities.

   (f) an accurate list of all courses actually offered.

   (g) an indication of when specific required courses will <u>not</u> be offered.

   (h) educational content of each course.

   (i) number of hours of instruction in each course and length of time in hours, weeks or months normally required for its completion.

(j) an accurate listing of faculty who currently teach.

(k) an indication of the distinction between adjunct or part-time faculty and full-time faculty.

(l) policies and procedures regarding acceptability of credits from other institutions.

(m) general acceptability by other institutions of credits earned at this institution.

(n) requirements for graduation.

(o) statement of certificates, diplomas, or degrees awarded upon graduation.

(p) statement of all charges for which a student may be held responsible.

(q) financial aid programs actually available to students.

(r) limitations on eligibility for financial aid programs.

(s) grading system.

(t) policies relating to:

(1) tardiness
(2) absences
(3) make-up work
(4) student conduct
(5) termination
(6) re-entry after termination

(u) student fee increases in excess of $25 that are planned within the next year.

(v) for student loan applicants:

(1) the effective annual loan interest rate
(2) loan repayment obligations
(3) loan repayment procedures
(4) time allowed for repayment
(5) deferment or cancellation provisions, if any
(6) collection procedures which might be applied in the event of failure to repay

2. In the event any of the following services or facilities are provided, failure to disclose their actual availability and extent:

(a) Job placement assistance or service.

(b) counseling, including for employment, academic, and/or personal problems.

(c) dining facilities.

(d) housing facilities.

(e) student parking facilities.

3. In the event the institution offers an educational program which leads to the award of degrees (or which results in credits which are transferable toward the award of degrees), failure to provide accurate descriptions of:

   (a) recognition by a state agency as meeting established educational standards for granting degrees, if there is such an agency;

   (b) the scope and sequence of required courses or subject areas in each degree program; and

   (c) policies and procedures which students must follow to transfer credits within the institution and/or to other institutions.

F. Student Orientation Procedures

1. The institution does not conduct a formal orientation program for newly enrolled students.

2. Failure to include in this orientation the following:

   (a) oral presentations or written documents prepared by students who have been previously enrolled at the institution.

   (b) instructions on how and where to voice student complaints and grievances.

   (c) information on how and where to apply for student financial aid.

G. Job Placement Services and Follow-Through

1. In the event the institution claims to have a job placement service, this service does not include the following aspects:

   (a) notification of fee charged, if this is the case.

   (b) formal training in job-seeking and job-holding skills.

   (c) contacting prospective employers to develop potential jobs.

   (d) making job interview appointments for individual students, including those seeking part-time employment and recent graduates.

2. In the event the institution claims to have a job placement service, the service is confined only to such services as distributing "Help wanted" ads from newspapers or referral to a commercial placement service.

3. The institution does not regularly collect follow-up data on the employment success of former students who did not graduate, recent graduates, and/or longer term graduates.

4. Institution does not annually calculate the rates of student attrition from each identifiable program or curriculum area and does not attempt to determine the reasons for this attrition.

H. Recordkeeping Practices

1. The institution does not maintain the following items in its individual student records:

   (a) total fees paid by the student.

   (b) courses taken and completed.

   (c) academic credits, grades earned.

   (d) financial aid amounts, including loans, if any, actually received by student and date of his/her receipt.

2. Institution does not have a written policy and actual procedures for maintaining individual student access to records for a period of at least two years following his/her departure from the institution, regardless of the operating status of the institution.

I. Turnover of Instructional Staff

1. Instructional staff are repeatedly replaced, in the same sections/courses, after instruction has begun.

2. Instructional staff are replaced in two or more sections/courses after instruction has begun.

J. Representation of Chartered, Approved, or Accredited Status

1. The institution fails to disclose to students and prospective students the fact(s) of limitation(s) or sanction(s) for noncompliance with designated standards imposed by local, state, or federal government agencies, if any exist.

2. The public representations of the institution fail to distinguish between (e.g., list separately, with appropriate explanations) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state chartering and licensing, if any are present.

K. Financial Stability

1. If the institution is not publicly-supported, it does not have the following:

   (a) an endowment or retained earnings fund to pay current operating expenses if they are not covered by student tuition receipts.

   (b) a reserve of funds sufficient to pay out tuition refunds as students make legitimate requests for them.

2. The institution's financial records and reports are not annually subjected to a certified audit.

L. Instructional Programs in Occupational, Professional Preparation Areas

1. The institution does not maintain curriculum advisory committees which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. The institution does not provide the following, when they are required for employment of graduates in an occupational/professional area:

   (a) specialized/professional program accreditation.

   (b) training in the use of basic tools and equipment.

   (c) internships and/or supervised practice on the job.

   (d) internships and/or supervised practice in simulated job situations.

   (e) instruction on topics necessary for state or professional certification of graduates.

3. The institution does not require a biannual review of the relevance and timeliness of occupational/professional curricula.

M. Instructional Equipment and Facilities in Occupational/Professional Preparation Areas

1. The institution does not maintain advisory committes on instructional equipment and facilities which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. The institution does not annually budget and expend funds for replacing worn or outdated instructional equipment in each occupational/professional area for which instruction is offered.

APPENDIX B

# INSTITUTIONAL REPORT FORM:

## for

## Postsecondary Occupational Training

## Institutions/Programs

developed by

The American Institutes for Research
P.O. Box 1113
Palo Alto, California 94302
(415) 493-3550

1 September 1976

This instrument was prepared pursuant to Contract 300-75-0383 from the Office of Planning, Budgeting, and Evaluation, Office of Education, U.S. Department of Health, Education, and Welfare. The content, however, does not necessarily reflect the position or policy of the sponsor, and no official endorsement by the sponsor should be inferred.

# Introduction

This form is designed to serve as the basis for on-site assessments of the consumer protection policies and practices of postsecondary educational institutions. It is meant to be used by officials of government regulatory agencies or by members of non-governmental accreditation teams in conjunction with their inspection visits to institutions which are eligible for or are applying for eligibility for federal student assistance programs. The uses of the items in this form and their scoring and analysis procedures are described in separate users' guides; these guides should be studied in detail before attempting any institutional assessments.

Some of the items in this form may be completed on the basis of an interview with officials of an institution to be assessed. Other items require that you acquire and read the institution's catalog, certain written policy statements (if they are available), and representative advertising copy (if available). Depending on the size of the institution and its complexity, completing the form will take from under 30 minutes to over two hours.

One purpose of the form is to stimulate an institution's own efforts to protect the consumer rights of its students and prospective students. No institution is perfect in this regard. Therefore, you are urged to share all questions with officials of the institution being assessed; this sharing can help them to bring about any needed improvements voluntarily.

Each topic in the form is introduced by a brief rationale explaining the nature of the potential abuse it is designed to detect. Where there may be questions about the meaning of an item, interviewer notes are inserted. Most item response options include a provision for cases where the item is not applicable to the institution being assessed; as a general rule, if "not applicable" response options are not provided, and the item does not apply, leave the item blank. However, omissions should be avoided whenever possible.

## Refund Policies and Practices

*Rationale for this topic: One of the most common sources of student complaints about postsecondary educational experiences is institutional failure to refund tuition and fee payments. Institutions are clearly justified in requiring advance tuition and fee payments and retaining a portion of these payments to cover processing costs in the event a student withdraws for reasonable cause. However, it is generally agreed that <u>all</u> institutions should have a written refund policy stating clearly when and under what conditions refunds will be granted and should make timely refunds (without inordinate delay) to students who abide by stated institutional policy. There is less general agreement but strong support for "pro rata" refund policies, in which students receive a refund equal in proportion to the percentage of prepaid instruction they did not receive, minus a fair amount to reimburse institutional processing costs.*

1. Does this institution require students to pay or otherwise obligate to pay <u>any</u> of the following fees or charges in advance of enrollment or class attendance? Fill in <u>one</u> oval for each option.

| | No | Yes | |
|---|---|---|---|
| *1a* | 0 | 0 | Resident tuition of tuition generally applicable to all students. |
| *1b* | 0 | 0 | Non-resident tuition or tuition paid only by certain groups of students. |
| *1c* | 0 | 0 | Room and board charges or deposits. |
| *1d* | 0 | 0 | Application or registration fees in excess of $50. |
| *1e* | 0 | 0 | Other required student fees in excess of $50 (excluding books). |

If you filled in "no" to all the options above, skip the following three items and go on to page 4, Advertising Policies and Practices.

2. Does this institution have a <u>written</u> refund policy regarding <u>all</u> those fees for which "yes" was checked in item 1? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| *2a* | 0 | 0 |

If you filled in "no" to item 2 above, skip the following two items and go on to page 4, Advertising Policies and Practices.

3. How is the written refund policy made available to students? Fill in one oval for each option.

| | No | Yes | |
|---|---|---|---|
| 3a | 0 | 0 | It is made available for public inspection at the institution. |
| 3b | 0 | 0 | It is printed in the school's general catalog or bulletin. |
| 3c | 0 | 0 | It is distributed to all enrolled students. |
| 3d | 0 | 0 | It is distributed to all prospective students. |

4. Does this institution's written refund policy specify the following items? Fill in one oval for each option, after reading the policy statement.

| | No | Yes | |
|---|---|---|---|
| 4a | 0 | 0 | Those fees and charges which are not refundable. |
| 4b | 0 | 0 | All conditions which students must meet to obtain refunds. |
| 4c | 0 | 0 | How to properly apply for a refund. |
| 4d | 0 | 0 | A refund formula by which students pay, in effect, only for the instruction they have actually had the opportunity to receive. |
| 4e | 0 | 0 | Any non-refundable application processing fee or other types of non-refundable student fees exceeding $50. |
| 4f | 0 | 0 | A limitation on the time allowed between receipt of a valid refund request and the issuance of a refund. |

*Rationale for item 4: These are aspects of a refund policy which are desirable for all institutions which collect fees in advance. Students need to know when they qualify for a refund and how they must apply for it. Also, students should be able to assume that institutions will process valid refund requests within a reasonable period of time. Large non-refundable application or processing fees should be avoided and should never be applied without ample advance notice to enrollees and students. "Pro rata" tuition refund policies are required for veterans receiving benefits from the Veterans Administration and are imposed on proprietary schools in some states to curb the use of "hard sell" techniques by sales representatives.*

## Advertising Policies and Practices

*Rationale for this topic: More and more schools are using advertising as a technique to increase enrollments. Abusive advertising occurs when false, misleading, or unsubstantiated claims are made, whether or not the abuse is intentional. All institutions which use the public media in attempting to attract students should be aware that certain specific practices (which are in fact illegal in a number of states) involve a potential for abuse. If the institution chooses to use them anyway, regulatory bodies and consumers should be made aware of the fact. Further, the Chief Executive Officer of an institution should be responsible for the advertising practices of that institution. If advertising is released without the director's review, especially by personnel who stand to gain from increased enrollment, there is a higher probability that misleading advertising will result.*

1. Does this institution use the following advertising techniques in attracting applicants for admission? Fill in <u>one</u> oval for each option, after reading a representative sample of the institution's advertising, if possible.

| | No | Yes | |
|---|---|---|---|
| *1a* | 0 | 0 | Classified ads in the "Help Wanted" section of the newspaper, <u>not</u> for employed positions at the institution, but to obtain "leads" on potential students. |
| *1b* | 0 | 0 | Competitions or contests in which virtually everyone "wins," designed only to stimulate enrollments. |
| *1c* | 0 | 0 | Testimonials or endorsements by persons who did not, in fact, attend this institution. |
| *1d* | 0 | 0 | Offers of limited time "discounts" on tuition charges, room and board charges, etc. |

2. Does this institution make the following statements in any of its advertising? Fill in <u>one</u> oval for each option, after reading a representative sample of the institution's advertising, if possible.

| | No | Yes | | |
|---|---|---|---|---|
| | | | ↓ | This institution does no advertising of any type (including professional journal or telephone directory notices). |
| *2a* | 0 | 0 | 0 | Completing the education or training offered at this institution guarantees employment. |

| | No | Yes | This institution does no advertising of any type (including professional journal or telephone directory notices). | |
|---|---|---|---|---|
| 2b | 0 | 0 | 0 | Completing the education or training offered at this institution is likely to lead to employment, without presenting accurate supporting data. |
| 2c | 0 | 0 | 0 | There are ties or connections between this institution and specific employers which will result in special employment considerations for graduates, when in fact there are no such ties. |
| 2d | 0 | 0 | 0 | Scholarships or other forms of no-cost financial assistance are available, when in fact they have not been awarded during the past year. |
| 2e | 0 | 0 | 0 | The educational program is superior to the educational program offered at competing institutions. |
| 2f | 0 | 0 | 0 | Recognized experts or other types of well-known persons are on the teaching faculty, when in fact they have no teaching responsibilities. |

3. Does a responsible administrative officer of this institution (or higher administrative level, for example, district or corporate office) review advertising copy before it is released? Fill in <u>one</u> oval for each option.

| | No | Yes | This institution does no advertising of any type (including professional journal or telephone directory notices). | |
|---|---|---|---|---|
| 3a | 0 | 0 | 0 | Some or most of it. |
| 3b | 0 | 0 | 0 | All of it. |

## Admissions Practices

*Rationale for this topic: There is a fine line between innovative, active admissions practices and abusive admissions practices. The latter are one of the most frequently cited topics of student complaints, yet active recruitment is becoming more and more essential for institutional survival in this time of declining enrollments. The present topic area attempts to inquire about techniques which have a high potential for causing abuse, as judged by common sense, recent literature, and documented student complaints.*

1. Does this institution employ admissions representatives whose compensation or salary is based wholly or in part on commissions? Fill in one oval.

| | No | Yes |
|---|---|---|
| *1a* | 0 | 0 |

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. How are these commissions calculated? Fill in one oval for each option.

| | No | Yes | |
|---|---|---|---|
| *2a* | 0 | 0 | They are based on the number of students enrolled. |
| *2b* | 0 | 0 | They are based on the number of students enrolled who actually attend classes. |
| *2c* | 0 | 0 | They are based on the number of students enrolled who graduate. |

3. Does this institution have a written policy which governs recruiting and/or admissions practices? Fill in one oval.

| | No | Yes |
|---|---|---|
| *3a* | 0 | 0 |

If you filled in "no" to item 3 above, skip item 4 and go on to item 5.

4. Does this institution's written recruiting and/or admissions policy specify the following items? Fill in one oval for each option, after reading the policy statement.

| | No | Yes | |
|---|---|---|---|
| *4a* | 0 | 0 | A code of ethics which prohibits certain recruiting/admissions practices. |

| | No | Yes | |
|---|---|---|---|
| 4b | 0 | 0 | A requirement that prospective students talk to a staff member, at the institution, prior to enrolling. |
| 4c | 0 | 0 | The completion of a signed enrollment agreement which describes costs, payment requirements, and educational services to be provided by the institution. |

5. Does this institution have a policy of regularly admitting students who do not meet stated admissions requirements? Fill in <u>one</u> oval.

| | No | Yes | ↓ This institution has no stated admissions requirements. |
|---|---|---|---|
| 5a | 0 | 0 | 0 |

If you filled in "no" or "no stated admissions requirements" to item 5 above, skip the following item and go on to page 8, Instructional Staff Evaluation Practices.

6. For students who do not meet stated admissions requirements, but are admitted under a special admissions policy, are the following courses provided? Fill in <u>one</u> oval for each option.

| | No | Yes | |
|---|---|---|---|
| 6a | 0 | 0 | Courses or sections offering remedial instruction in basic English. |
| 6b | 0 | 0 | Courses or sections offering remedial instruction in basic mathematics. |
| 6c | 0 | 0 | Special academic tutoring programs offering remedial instruction related to students' needs. |

*Rationale for items 5 and 6: If an institution has an essentially "open" admissions policy, then it should also have remedial services to assist students who may be underqualified. Failure to do so may be taking unfair advantage of underqualified students in the pretense of "giving them an opportunity."*

## Instructional Staff Evaluation Practices

*Rationale for this topic: Unqualified and unmotivated staff provoke many student complaints; but the determination of staff qualifications and motivation, like the determination of quality of educational program, is problematic and beyond the scope of this form. However, there appear to be certain steps which can be taken to evaluate and improve instructional staff. All institutions should carry out such steps as a matter of institutional policy.*

1. Is teaching competence (no matter how it is evaluated) included as one criterion in the formal salary and/or tenure and/or rank review policies of this institution? Fill in one oval.

| | No | Yes | This institution has no formal salary/tenure/rank review policies. |
|---|---|---|---|
| *1a* | 0 | 0 | 0 |

2. Is teaching competence systematically evaluated by the following groups at this institution? Fill in one oval for each option.

| | No | Yes | |
|---|---|---|---|
| *2a* | 0 | 0 | By administrative staff. |
| *2b* | 0 | 0 | By other faculty of the same department or program. |
| *2c* | 0 | 0 | By students. |
| *2d* | 0 | 0 | By graduates. |
| *2e* | 0 | 0 | By self-ratings. |
| *2f* | | 0 | Other, please describe on the last page of the questionnaire. |

If you filled in "no" to "by students" in item 2 above, skip the following two items and go on to page 10, Disclosure in Written Documents.

3. Are students evaluations of teaching faculty members conducted on a regular basis (for example, yearly, at the end of each course, etc.)? Fill in one oval.

| | No | Yes |
|---|---|---|
| *3a* | 0 | 0 |

If you filled in "no" to item 3 above, skip the following item and go on to page 10, Disclosure in Written Documents.

4. Does the system of evaluation of instructors by students include the following provisions? Fill in one oval for each option.

| | No | Yes | | |
|---|---|---|---|---|
| 4a | 0 | 0 | | Anonymous student responding. |
| 4b | 0 | 0 | | Objective student responding (for example, on machine scored answer sheets). |
| 4c | 0 | 0 | | Evaluations of all full-time faculty members. |
| | | | | ↓ There are no part-time faculty members. |
| 4d | 0 | 0 | 0 | Evaluations of all part-time faculty members (for example, adjunct faculty members). |

## Disclosure in Written Documents

*Rationale for this topic: Lack of adequate disclosure by an institution can be intentional or unintentional. If it is intentional and students are misled as a result, the result is consumer fraud. Much more common are situations in which lack of adequate disclosure is unintentional, and students make important decisions based on faulty or no information. Student anger when the true facts become known is no less justified under these circumstances than under circumstances of intentional fraud. All institutions should, as a routine policy, disclose certain important facts, both to prospective enrollees and already enrolled students. Nor should students have to exert unreasonable effort to seek out these facts; they should be written clearly, in common English, and handed, free, to all.*

*Interviewer note: The items below do not ask whether particular conditions or services exist at the institution, but whether their existence or non-existence is adequately disclosed in public documents.*

1. Does this institution disclose information on the following topics in its general catalog, bulletin, or basic public information document or a combination of these? Fill in one oval for each option, after reading the appropriate documents.

| | No | Yes | |
|---|---|---|---|
| *1a* | 0 | 0 | Name and address of school. |
| *1b* | 0 | 0 | Date of publication of the document. |
| *1c* | 0 | 0 | School calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance. |
| *1d* | 0 | 0 | A statement of institutional philosophy and program objectives. |
| *1e* | 0 | 0 | A brief description of the school's physical facilities. |
| *1f* | 0 | 0 | An accurate list of all courses actually offered, or all subject areas actually taught if separate courses do not exist. |
| *1g* | 0 | 0 | An indication of when specific required courses will not be offered. |
| *1h* | 0 | 0 | Educational content of each course, or of the program if separate courses do not exist. |

| | No | Yes | |
|---|---|---|---|
| 1i | 0 | 0 | Number of hours of instruction in each course, or in the program if separate courses do not exist, and length of time in hours, weeks, or months normally required for its completion. |
| 1j | 0 | 0 | An accurate listing of faculty who currently teach. |
| 1k | 0 | 0 | An indication of the distinction between adjunct or part-time faculty and full-time faculty (if this distinction does not exist at this institution, fill in "yes"). |
| 1l | 0 | 0 | Policies and procedures regarding acceptability or non-acceptability of credits from other institutions. |
| 1m | 0 | 0 | General acceptability or non-acceptability by other institutions of credits earned at this institution. |
| 1n | 0 | 0 | Requirements for graduation. |
| 1o | 0 | 0 | Statement of certificates or diplomas awarded upon graduation. |
| 1p | 0 | 0 | Notice of <u>all</u> charges for which a student may be held responsible (if no charges exist at this institution, fill in "yes"). |
| 1q | 0 | 0 | Financial aid programs actually available to students, or instructions on how to obtain such information. |
| 1r | 0 | 0 | Limitations on eligibility for financial aid programs, or instructions on how to obtain such information. |
| 1s | 0 | 0 | Grading system. |
| | | | Policies relating to: |
| 1t | 0 | 0 | Tardiness |
| 1u | 0 | 0 | Absences |
| 1v | 0 | 0 | Make-up work |
| 1w | 0 | 0 | Student conduct |
| 1x | 0 | 0 | Termination |
| 1y | 0 | 0 | Re-entry after termination |

2a. If there are any standard limitations on post-training employment opportunities for students at this institution (for example, medical or health requirements, professional licensing requirements, apprencticeships, age, experience, further training by employer, etc.), are these limitations disclosed in the basic public information document(s)? Fill in <u>one</u> oval.

| | No | Yes | ↓ There are no standard limitations on post-training employment opportunities for students at this institution. |
|---|---|---|---|
| 2a1 | 0 | 0 | 0 |

2b. If this institution lacks specialized or professional course accreditation which is required for post-training employment of students, is this lack disclosed in the public information document(s)? Fill in one oval.

- 0 The lack of specialized accreditation is not disclosed.
- 0 The lack of specialized accreditation is disclosed.
- 0 Specialized or professional course accreditation is not required for post-training employment in any of the courses of study offered at this institution, or all courses requiring specialized accreditation are so accredited.

2c. Does this institution provide accurate descriptions of the availability and extent of the following student services in its basic public information document(s)? Fill in one oval for each option.

| | No | Yes | No service of this type exists at this institution. | |
|---|---|---|---|---|
| *2c* | 0 | 0 | 0 | Job placement |
| *2cd* | 0 | 0 | 0 | Student counseling |
| *2ce* | 0 | 0 | 0 | Dining facilities (for example, a student cafeteria. Do not count vending machines.) |
| *2cf* | 0 | 0 | 0 | Housing facilities |
| *2cg* | 0 | 0 | 0 | Parking facilities |

*Note: Items 2h, 2i, and 2j, dealing with degree-granting practices, are omitted from this form.*

3. Are increases in any student fees in excess of $25 currently planned to occur within the next year? Fill in one oval.

| | No | Yes |
|---|---|---|
| *3a* | 0 | 0 |

If you filled in "no" to item 3 above, skip item 4 and go on to item 5.

4. Are the planned fee increases disclosed in writing to all students and prospective enrollees to whom they might apply? Fill in one oval.

| | No | Yes |
|---|---|---|
| *4a* | 0 | 0 |

5. Does this institution make student loans, either directly from the institution or as a lender for one of the federal or state student loan programs? Fill in one oval.

| | No | Yes |
|---|---|---|
| 5a | 0 | 0 |

If you filled in "no" to item 5 above, skip the following item and go on to page 14, Student Orientation Practices.

6. Do all applicants for student loans (excluding short-term or emergency loans) receive printed documents from the institution which disclose the following, before any repayment obligation begins? Fill in one oval for each option.

| | No | Yes | |
|---|---|---|---|
| 6a | 0 | 0 | The effective annual loan interest rate. |
| 6b | 0 | 0 | Loan repayment obligations. |
| 6c | 0 | 0 | The process for repayment of the loan. |
| 6d | 0 | 0 | The length of time allowed for repayment. |
| 6e | 0 | 0 | The procedure for renegotiating the repayment schedule for the loan or deferred fees. |
| 6f | 0 | 0 | Procedures for deferment or cancellation of portions of the loan or deferred fees, if necessary. |
| 6g | 0 | 0 | Procedures for loan or deferred fee collection which will be used in the event of failure to repay. |

## Student Orientation Practices

*Rationale for this topic area: Institutions have a responsibility to engage in certain affirmative student orientation practices to insure that newly enrolled students are aware of their rights and responsibilities. The orientation should especially include presentations by students who have been enrolled previously, so that they can share their experiences and acquired knowledge of the practices and policies of the institution.*

1. Does this institution conduct a program of orientation for incoming students? Fill in one oval.

| | No | Yes |
|---|---|---|
| *1a* | 0 | 0 |

If you filled in "no" to item 1 above, skip the following item and go on to page 15, Job Placement Services and Follow-Up of Graduates.

2. Does this student orientation include the following? Fill in one oval for each option.

| | No | Yes | |
|---|---|---|---|
| *2a* | 0 | 0 | An orientation newsletter or student handbook. |
| *2b* | 0 | 0 | Oral presentations or written documents prepared by students who have attended the institution recently. |
| *2c* | 0 | 0 | Instructions on how and where to voice complaints and grievances. |
| *2d* | 0 | 0 | Instructions on how to obtain information on available student financial aid. |

## Job Placement Services and Follow-Up of Graduates

*Rationale for this topic area: Two related topic areas are actually covered here. If institutions do not claim to offer placement assistance, it is of course not mandatory that they do so. If placement assistance <u>is</u> offered, it should consist of certain essential services lest it be nothing more than a shoddy sales gimmick. Regardless of whether or not placement assistance is offered, follow-through (or follow-up of graduates and alumni) is essential as a method for evaluating the relevance and effectiveness of an institution's educational programs. Sampling and new student follow-up techniques make such follow-through a possibility for <u>all</u> institutions.*

1. Does this institution state that it offers job placement services or other placement assistance to students in finding jobs? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| *1a* | 0 | 0 |

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. Does the placement assistance offered by this institution include the following aspects? Fill in <u>one</u> oval for each option.

| | No | Yes | |
|---|---|---|---|
| *2a* | 0 | 0 | A fee for the assistance. |
| *2b* | 0 | 0 | Formal training in job-seeking and job-holding skills. |
| *2c* | 0 | 0 | Seeking out and/or contacting prospective employers. |
| *2d* | 0 | 0 | Making job interview appointments for individual students. |
| *2e* | 0 | 0 | Referral to a commercial placement service which charges a fee. |
| *2f* | 0 | 0 | Collation and distribution of "Help Wanted" ads from newspapers as the <u>only</u> placement assistance offered. |
| *2g* | 0 | 0 | Assistance in finding part-time jobs. |
| *2h* | | 0 | Other, please describe in the space provided at the end of the form. |

*Rationale for item 2: Genuine placement assistance or service performs at least the minimal functions of job development (contacting prospective employers regarding possible openings), training in job seeking and maintenance skills, and scheduling interviews for students, for both part-time and full-time jobs. Any placement assistance or service which does not perform these functions is in danger of being a charade, and calling it "placement" is a potential abuse.*

3. Does this institution systematically collect data on the employment success (however defined) of persons in its occupational or professional preparation programs? Fill in one oval for each option.

| | No | Yes | This institution currently has no occupational or professional preparation students or graduates. | |
|---|---|---|---|---|
| *3a* | 0 | 0 | 0 | Former students who did not graduate. |
| *3b* | 0 | 0 | 0 | Recent graduates (within one year of graduation). |
| *3c* | 0 | 0 | 0 | Recent graduates (within five years of graduation). |

*Rationale for item 3: With the efficiency of modern sampling and follow-up techniques, even lack of a large budget is no excuse for not trying to collect some data on the ultimate desired outcome of occupational or professional preparation programs--employment success.*

4. Does this institution systematically collect data on the numbers and characteristics of students who drop out of the school at the time they leave or soon thereafter? Fill in one oval for each option.

| | No | Yes | |
|---|---|---|---|
| *4a* | 0 | 0 | For all students enrolled in occupational or professional preparation programs or majors. |
| *4b* | 0 | 0 | For all enrolled students regardless of program or major. |

## Recordkeeping Practices

*Rationale for this topic: Institutions which do not adequately maintain student records in a central location make it extremely difficult for current and former students to access them when there is a need to do so. Moreover, if an institution should cease operations, lack of a record maintenance policy can cause great inconvenience and even abuse of current and former students, who are unable to secure necessary proof of their past education.*

1. Are individual student records maintained which contain the following items? Fill in <u>one</u> oval for each option.

| | No | Yes | | |
|---|---|---|---|---|
| | | | | ↓ No fees are charged by this institution. |
| *1a* | 0 | 0 | 0 | Total fees paid by the student. |
| *1b* | 0 | 0 | | Courses taken and completed or subject matter covered by the student. |
| | | | | ↓ No internships or supervised practice are offered by this institution. |
| *1c* | 0 | 0 | 0 | Internships or other forms of supervised professional practice. |
| *1d* | 0 | 0 | | Academic credits, grades, or indicators of satisfactory progress earned by the student. |
| | | | | ↓ No financial aid is offered by this institution directly. |
| *1e* | 0 | 0 | 0 | Financial aid amounts, including loans received by the student directly from the institution, if any. |
| *1f* | | 0 | | Other, please describe in the space provided at the end of the form. |

2. Does this institution have a <u>written</u> policy for maintaining, or arranging for maintenance of, individual student access to records for a period of at least two years in the event of a school closure or change of control? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| *2a* | 0 | 0 |

## Maintaining Stability of Instructional Staff

*Rationale for this topic: One of the most disturbing educational experiences is the turnover of instructional staff during a course. Each turnover causes extreme disruption and loss of essential continuity. Furthermore, excessive staff instability is a probable indicator of deeper troubles in an institution.*

1. During the previous calendar year, how many times was there an unscheduled, permanent change of instructor after instruction had begun (for reasons other than illness or death of original instructor)? Fill in the number; if none, enter as zero.

1a Number of times: _____

2. This represented what percentage of the total number of instructors teaching during that calendar year? Fill in the percentage; if none, enter as zero.

2a Percentage: _____

3. During the previous calendar year, did any unscheduled, permanent change of instructor occur in the same course or subject area twice or more often after instruction had begun? Fill in one oval.

| | No | Yes |
|---|---|---|
| 3a | 0 | 0 |

## Representation of Current Approved or Accredited Status

*Rationale for this topic: Students should be accurately informed about the actual status of an institution or its programs with regard to state or veterans approval, private accreditation, and any pending legal actions. It is the responsibility of the institution to provide and not to misrepresent this information. Misrepresentation is a subtle abuse which may cause students to believe an institution has been evaluated and approved, when in fact it has not been.*

1. Is this institution currently on suspension, probation, or some other form of limitation or sanction for noncompliance with designated standards, by any of the following government agencies? Fill in <u>one</u> oval for each option.

| | No | Yes | |
|---|---|---|---|
| *1a* | 0 | 0 | A local government agency (for example, Consumer Protection Agency, District Attorney, etc.). |
| *1b* | 0 | 0 | A state government agency (for example, State Approving or Licensing Agency, Attorney General, etc.). |
| *1c* | 0 | 0 | A federal government agency (for example, Federal Trade Commission, Office of Guaranteed Student Loans/DHEW, etc.). |

If you filled in "no" to all of the above options, skip item 2 and go on to item 3.

2. Are the facts of the above limitation(s) or sanction(s) publicly disclosed to enrolled students and prospective students? Fill in <u>one</u> oval for each option.

| | No | Yes | |
|---|---|---|---|
| *2a* | 0 | 0 | In printed form to all enrolled students. |
| *2b* | 0 | 0 | In printed form to all prospective students. |

3. Do the public representations of this institution clearly indicate (and distinguish between, where applicable) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state licensing and approval? Fill in one oval after reading the public information documents of the institution if possible.

| | No | Yes | Not Applicable. |
|---|---|---|---|
| 3a | 0 | 0 | 0 |

## Financial Stability

*Rationale for this topic: As many regulatory bodies have discovered too late, it is very difficult to either measure or guard against financial instability in a postsecondary institution. However, certain practices are more likely than others to insure that institutions do not close down, leaving students with no recourse. Regulatory bodies should know about these practices in institutions for which they are responsible; consumers should also be aware of these practices.*

1. Are the central financial records and reports of this institution regularly subjected to the following audits or inspections? Fill in <u>one</u> oval for each option.

| | No | Yes | |
|---|---|---|---|
| *1a* | 0 | 0 | <u>Uncertified</u> audit by an accounting firm. |
| *1b* | 0 | 0 | <u>Certified</u> audit by an accounting firm. |
| *1c* | 0 | 0 | Inspection by a state regulatory or auditing agency. |
| *1d* | 0 | 0 | Inspection by a federal regulatory or auditing agency. |

2. Is this a publicly-supported institution (that is, over 50% public funding)? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| *2a* | 0 | 0 |

If you filled in "yes" to item 2 above, skip the following four items and go on to page 23, Occupational Instructional Programs.

3. Does this institution have an endowment, retained earnings fund, or other reserve of funds or income to pay operating expenses not covered by current student tuition receipts? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| *3a* | 0 | 0 |

4. Do the financial reporting practices of this institution report uncollected tuition as assets, without indicating an offsetting liability? Fill in <u>one</u> oval after looking at a current financial statement, if possible.

| | No | Yes |
|---|---|---|
| 4a | 0 | 0 |

5. Is this institution currently engaged in bankruptcy proceedings, or is there any serious possibility that it might enter into bankruptcy proceedings during the next 12 months? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| 5a | 0 | 0 |

If you filled in "no" to item 5 above, skip the following item and go on to page 23, Occupational Instructional Programs.

6. Does this institution publicly disclose information about bankruptcy proceedings that are underway or planned? Fill in <u>one</u> oval for each option.

| | No | Yes | |
|---|---|---|---|
| 6a | 0 | 0 | This information is disclosed to all enrolled students. |
| 6b | 0 | 0 | This information is disclosed to all prospective enrollees. |

## Occupational Instructional Programs

*Rationale for this topic: There is no intent in this section to gather indicators of the "quality" of an institution's instructional program. This is a complicated task better handled by the accreditation or approval process. The intent of this section is to gather descriptive indicators of institutional practices which are viewed as essential for the maintenance and improvement of quality. In the occupational/vocational program area, students (and employers) generally expect training to result in certain very specific skill outcomes. If the institution does not take definite steps to see that these outcomes are achieved in its graduates, it is in danger of malpractice. We have no definitive catalog of such steps (if we did, we would start a school); we have included practices about which there is general agreement.*

1. Does this institution maintain and utilize advisory committee(s) on curriculum content? Fill in one oval for each option.

| | No | Yes | |
|---|---|---|---|
| *1a* | 0 | 0 | For some of the occupational/professional preparation program areas offered at this institution. |
| *1b* | 0 | 0 | For all occupational/professional preparation program areas offered at this institution. |

If you filled in "no" for both options to item 1 above, skip item 2 and go on to item 3.

*Rationale for item 1: Institutions lacking such advisory bodies tend to insulate themselves and their curricula from current practices and technology in business, industry, and government, and in so doing they jeopardize the chances of their students for placement in jobs appropriate to the type of training which they have completed.*

2. Do these committee(s) include representatives of potential employers? Fill in one oval for each option.

| | No | Yes | |
|---|---|---|---|
| *2a* | 0 | 0 | For some of the occupational/professional preparation program areas offered at this institution. |
| *2b* | 0 | 0 | For all occupational/professional preparation program areas offered at this institution. |

3. Do <u>all</u> of the occupational/professional preparation programs in this institution possess <u>specialized/professional accreditation</u>, if this is a requirement for the employment of graduates in those occupations or professions? Fill in <u>one</u> oval.

| | No | Yes | |
|---|---|---|---|
| 3a | 0 | 0 | 0 ← Specialized/professional accreditation is not <u>required</u> for any position in any occupation or profession for which this institution provides preparation. |

4. Do <u>all</u> of the occupational/professional preparation programs in this institution provide sufficient <u>training in the use of basic tools and equipment</u>, if this is a requirement for the employment of graduates in those occupations or professions? Fill in <u>one</u> oval.

| | No | Yes | |
|---|---|---|---|
| 4a | 0 | 0 | 0 ← Training in the use of basic tools and equipment is not <u>required</u> for any position in <u>any</u> occupation or profession for which this institution provides preparation. |

5. Do <u>all</u> of the occupational/professional preparation programs in this institution provide for <u>internships and/or supervised practice on the job</u>, if this is a requirement for the employment of graduates in those occupations or professions? Fill in <u>one</u> oval.

| | No | Yes | |
|---|---|---|---|
| 5a | 0 | 0 | 0 ← Internships and/or supervised practice on the job are not <u>required</u> for any position in <u>any</u> occupation or profession for which this institution provides preparation. |

6. Do <u>all</u> of the occupational/professional preparation programs in this institution provide for <u>internships and/or supervised practice in simulated job situations</u>, if this is a requirement for the employment of graduates in those occupations or professions? Fill in <u>one</u> oval.

| | No | Yes | |
|---|---|---|---|
| 6a | 0 | 0 | 0 ← Internships and/or supervised practice in simulated job situations are not <u>required</u> for any position in <u>any</u> occupation or profession for which this institution provides preparation. |

7. Do <u>all</u> of the occupational/professional preparation programs in this institution provide for <u>instruction on topics necessary for state or professional certification in this state</u>, if such certification is a requirement for the employment of graduates in those occupations or professions? Fill in <u>one</u> oval.

| | No | Yes | |
|---|---|---|---|
| 7a | 0 | 0 | 0 State or professional certification in this state is not <u>required</u> for any position in <u>any</u> occupation or profession for which this institution provides preparation. |

8. Does this institution require reviews of the relevance and timeliness of <u>all</u> of its occupational/professional preparation curricula once every two years or more frequently? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| 8a | 0 | 0 |

## Occupational Instructional Equipment and Facilities

*Rationale for this topic area: Some schools impose outdated or improperly functioning equipment on their students. This affects how adequately graduates are prepared for employment once they complete their instructional programs. Some schools start new programs but fail to purchase the amount and type of equipment needed to run the program. Both types of practice are abusive.*

1. Does this institution utilize advisory committees on instructional equipment and facilities? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| *1a* | 0 | 0 |

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. Do these advisory committees include representatives of potential employers? Fill in <u>one</u> oval for each option.

| | No | Yes | |
|---|---|---|---|
| *2a* | 0 | 0 | For <u>some</u> of the occupational/professional preparation program areas offered at this institution. |
| *2b* | 0 | 0 | For <u>all</u> occupational/professional preparation program areas offered at this institution. |

3. Does this institution annually expend sufficient funds for replacing worn or outdated instructional equipment (including lab and other non-classroom equipment)? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| *3a* | 0 | 0 |

4. Does this institution annually expend funds for new instructional equipment (including lab and other non-classroom equipment) sufficient to meet projected program needs? Fill in <u>one</u> oval.

| | No | Yes |
|---|---|---|
| *4a* | 0 | 0 |

## Additional Comments

Please write additional comments in the space below. If you are commenting on specific items, be sure to include the section and item number.

| Section and Item Number | Comment |
| --- | --- |
| | |

APPENDIX C

Modifications to Occupational Training
Institutional Report Form for Postsecondary
Degree-Granting Institutions/Programs

1. The following items are added to the section on Disclosure in Written Documents, on page 12.

   Does this institution provide accurate descriptions of the following institutional conditions or procedures regarding the award of degrees?

| | Yes | No | |
|---|---|---|---|
| | | | No state agency exists for this purpose. ↓ |
| 2h | 0 | 0 | 0 Recognition by state agency as meeting established educational standards for granting degrees. |
| 2i | 0 | 0 | Scope and sequence of required courses or subject areas in each degree program. |
| | | | There is no transfer between departments and/or colleges. ↓ |
| 2j | 0 | 0 | 0 Policies and procedures regarding transfer between departments and/or colleges within the institution. |

2. The sections on Occupational Instruction Programs and Occupational Instruction Equipment and Facilities (pages 23-26) are removed.

# APPENDIX D

## IRF Coding, Editing and Weighting Specifications

| Field Name | Length | Raw Line/Bytes | Merged Bytes | Coding and Editing |
|---|---|---|---|---|
| School ID | 11 | 1/1-11 | 1-11 | bytes 1-2 state city code (geographical region)<br>01 = San Francisco<br>02 = Los Angeles<br>03 = Minneapolis<br>04 = St. Paul<br>05 = Kansas City<br>06 = St. Louis<br><br>byte 3 ownership status<br>1 = public<br>2 = private, non-profit, non-religious affiliated<br>3 = private, non-profit, religious affiliated<br>4 = proprietary<br><br>byte 4 school type<br>1 = occupational/vocational programs only<br>2 = 2 year degree-granting with some occupational/vocational programs<br>3 = 2 year degree-granting with no occupational/vocational programs<br>4 = 4 year degree-granting (may or may not include occupational/vocational programs)<br><br>byte 5 school size<br>1 = enrolled first year students < 25<br>2 = enrolled first year students 26-100<br>3 = enrolled first year students 101-250<br>4 = enrolled first year students 251-1000<br>5 = enrolled first year students >1000<br>byte 6-10 sequential numeric code (00001-nnnnn) unique for each school<br><br>byte 11 data source code<br>1 = data obtained from public documents only<br>2 = data obtained from documents plus personal interview<br>3 = data validity checked by second interviewer |
| **Topic 1 - Refund Policies and Procedures** | | | | yes = '1', no = '0', no response = '9' |
| Items 1a-1e | 5 | 1/12-16 | 12-16 | -if none are marked, code '9' to all 2a-4f and go to topic 2<br>-if all 1a-1e are NO, code '8' to all 2a-4f and go to topic 2<br>-if all 1a-1e are NO or no response, code '9' to all 2a-4f and go to topic 2 |
| Item 2a | 1 | 1/17 | 17 | -if no response, code '9' to all 3a-4f and go to topic 2<br>-if NO, code '8' to all 3a-4f and go to topic 2 |
| Items 3a-3d | 4 | 1/18-21 | 18-21 | -code as marked |
| Items 4a-4f | 6 | 1/22-27 | 22-27 | -code as marked |
| **Topic 2 - Advertising Practices** | | | | yes = '1', no = '0', no response = '9' |
| Items 1a-1d | 4 | 1/28-31 | 28-31 | -code as marked |
| Items 2a-2f | 6 | 1/32-37 | 32-37 | -code as marked |
| Items 3a-3b | 2 | 1/38-39 | 38-39 | -no non-response allowed unless both are non-response, else code a single non-response as NO('0') |
| **Topic 3 - Admissions Policies** | | | | yes = '1', no = '0', no response = '9' |
| Item 1a | 1 | 1/40 | 40 | -if no response, code '9' to all 2a-2c; go to 3a<br>-if NO, code '8' to 2a-2c; go to 3a |
| Items 2a-2c | 3 | 1/41-43 | 41-43 | -code as marked |
| Item 3a | 1 | 1/44 | 44 | -if no response, code '9' to 4a-4c; go to 5a<br>-if NO, code '8' to 4a-4c; go to 5a |
| Items 4a-4c | 3 | 1/45-47 | 45-47 | -code as marked |
| Item 5a | 1 | 1/48 | 48 | -if "no stated admissions policy," code '8' to 6a-6c and go to topic 4<br>-if no response, code '9' to 6a-6c, go to topic 4<br>-if NO, code '8' to 6a-6c and go to topic 4 |
| Items 6a-6c | 3 | 1/49-51 | 49-51 | -code as marked |

**Weighting - Item Responses**

Note: yes, no, and '8' (directed nonresponse) are in n and weight 1a-1e not weighted

2a NO = 2 plus 1 for each YES option above two in 1a-1e; YES = 0

| | NO | YES | 8 | | NO | YES | 8 |
|---|---|---|---|---|---|---|---|
| 3a(1) | 2 | 0 | 0 | 4c(7) | 1 | 0 | 0 |
| 3b(2) | 2 | 0 | 0 | 4d(8) | 0 | 0 | 0 |
| 3c(3) | 1 | 0 | 0 | 4e(9) | 0 | 1 | 0 |
| 3d(4) | 0 | 0 | 0 | 4f(10) | 1 | 0 | 0 |
| 4a(5) | 2 | 0 | 0 | | | | |
| 4b(6) | 1 | 0 | 0 | | | | |

| | YES | NO | 8 | | YES | NO | 8 |
|---|---|---|---|---|---|---|---|
| 1a(1) | 2 | 0 | 0 | 2b(6) | 1 | 0 | 0 |
| 1b(2) | 1 | 0 | 0 | 2c(7) | 1 | 0 | 0 |
| 1c(3) | 1 | 0 | 0 | 2d(8) | 1 | 0 | 0 |
| 1d(4) | 2 | 0 | 0 | 2e(9) | 1 | 0 | 0 |
| 2a(5) | 2 | 0 | 0 | 2f(10) | 1 | 0 | 0 |

3a and 3b treated as one item
NO,NO = 3 YES,YES = 0
YES,NO = 1 NO,YES = 0

| | YES | NO | 8 |
|---|---|---|---|
| 1a(1) | 1 | 0 | 0 |
| 2a(2) | 3 | 0 | 0 |
| 2b(3) | 2 | 0 | 0 |
| 2c(4) | 0 | 0 | 0 |
| 3a(5) | 0 | 3 | 0 |
| 4a(6) | 0 | 1 | 0 |
| 4b(7) | 0 | 1 | 0 |
| 4c(8) | 0 | 1 | 0 |
| 5a(9) | not weighted | | |
| 6a(10) | 0 | 1 | 0 |
| 6b(11) | 0 | 1 | 0 |
| 6c(12) | 0 | 1 | 0 |

| Field Name | Length | Raw Line/Bytes | Merged Bytes | Coding and Editing | Weighting - Item Responses |
|---|---|---|---|---|---|
| **Topic 4 - Instructional Staff** | | | | yes = '1', no = '0', no response = '9' | |
| Item 1a | 1 | 1/52 | 52 | -if "no formal review," code '8' to 1a | |
| Items 2a-2f | 6 | 1/53-58 | 53-58 | -if 2c is no response, code '9' to 3a-4d, go to topic 5 | |
| | | | | -code 2f as '9' (omit from weights) | |
| | | | | -if 2c is NO, code '8' to 3a-4d, go to topic 5 | |
| Item 3a | 1 | 1/59 | 59 | -if no response, code '9' to 4a-4d, go to topic 5 | |
| | | | | -if NO, code '8' to 4a-4d, go to topic 5 | |
| Items 4a-4d | 4 | 1/60-63 | 60-63 | -code as marked | |
| **Topic 5 - Written Disclosure** | | | | yes = '1', no = '0', no response = '9' | |
| Items 1a-1y | 25 | 1/64-88 | 64-88 | -code as marked | |
| Items 2a-2j | 10 | 1/89-98 | 80-98 | -code 'do not exist' as '8' in 2a-2j | |
| Item 3a | 1 | 1/99 | 99 | -if no response, code '9' to 4a and go to 5a | |
| | | | | -if NO, code '8' to 4a and go to 5a | |
| Item 4a | 1 | 1/100 | 100 | -code as marked | |
| Item 5a | 1 | 1/101 | 101 | -if no response, code '9' to all 6a-6g, go to topic 6 | |
| | | | | -if NO, code '8' to 6a-6g, go to topic 6 | |
| Items 6a-6g | 7 | 1/102-108 | 102-108 | -code as marked | |
| **Topic 6 - Student Orientation** | | | | yes = '1', no = '0', no response = '9' | |
| Item 1a | 1 | 1/109 | 109 | -if no response, code '9' to 2a-2d, go to topic 7 | |
| | | | | -if NO, code '8' to 2a-2d, go to topic 7 | |
| Items 2a-2d | 4 | 1/110-113 | 110-113 | -code as marked | |
| Filler | 6 | 1/114-119 | does not exist | leave blank | |
| Record ID | 1 | 1/120 | does not exist | code as '1' | |
| School ID | 11 | 2/1-11 | does not exist | code as in record '1' above | |
| **Topic 7 - Job Placement** | | | | yes = '1', no = '0', no response = '9' | |
| Item 1a | 1 | 2/12 | 114 | -if NO, code '8' to 2a-2h, go to 3a | |
| | | | | -if no response, code '9' to 2a-2h, go to 3a | |
| Items 2a-2h | 8 | 2/13-20 | 115-122 | -code as marked; code 2h as '9' | |
| Items 3a-3c | 3 | 2/21-23 | 123-125 | -if 'no students', code '8' | |
| Items 4a-4b | 2 | 2/24-25 | 126-127 | -code as marked | |
| **Topic 8 - Recordkeeping Practices** | | | | yes = '1', no = '0', no response = '9' | |
| Items 1a-1f | 6 | 2/26-31 | 128-133 | -code as marked; code 1f as '9' | |
| Item 2a | 1 | 2/32 | 134 | -code as marked | |
| **Topic 9 - Stability of Instructional Staff** | | | | yes = '1', no = '0', no response = '9' | |
| Item 1a | 3 | 2/33-35 | 135-137 | -code in actual number 000 ≤ N ≤ 989 | |
| | | | | -code '999' if no response | |
| Item 2a | 3 | 2/36-38 | 138-140 | -code actual percentage 000 ≤ P ≤ 100 | |
| | | | | -code '999' if no response | |
| Item 3a | 1 | 2/39 | 141 | -code as marked | |
| **Topic 10 - Representation of Status** | | | | yes = '1', no = '0', no response = '9' | |
| Items 1a-1c | 3 | 2/40-42 | 142-144 | -if no response to all 1a-1c, code '9' to 2a-2b, go to 3a | |
| | | | | -if NO to all 1a-1c, code '8' to 2a-2b, go to 3a | |
| | | | | -if any YES, go to 2a | |
| | | | | -else code '9' to 2a-2b and go to 3a | |
| Items 2a-2b | 2 | 2/43-44 | 145-146 | -code as marked | |
| Items 3a | 1 | 2/45 | 147 | -code as marked | |

**Topic 4 - Instructional Staff**

| | NO | YES | 8 | | NO | YES | 8 |
|---|---|---|---|---|---|---|---|
| 1a(1) | 3 | 0 | 0 | | | | |
| 2a,2b,2d,2e - treat as one item - less than 3 NO's = 0, three NO's = 1, four NO's = 2 | | | | | | | |
| 2c(4) | 2 | 0 | 0 | | | | |
| 2f(7) omit from weighting | | | | | | | |
| 3a(8) | 3 | 0 | 0 | 4c(11) | 1 | 0 | 0 |
| 4a(9) | 1 | 0 | 0 | 4d(12) | 1 | 0 | 0 |
| 4b(10) | 1 | 0 | 0 | | | | |

**Topic 5 - Written Disclosure**

| | NO | YES | 8 |
|---|---|---|---|
| 1a-1y | .5 | 0 | 0 |
| 2a-2b(1-2) | 1 | 0 | 0 |
| 2c-2j(3-10) | .5 | 0 | 0 |
| 3a(11) | not weighted | | |
| 4a(12) | 2 | 0 | 0 |
| 5a(13) | not weighted | | |
| 6a-6g(14-20) | 1 | 0 | 0 |

**Topic 6 - Student Orientation**

| | NO | YES | 8 |
|---|---|---|---|
| 1a(1) | 3 | 0 | 0 |
| 2a-2d(2-5) | 1 | 0 | 0 |

**Topic 7 - Job Placement**

| | NO | YES | 8 | | NO | YES | 8 |
|---|---|---|---|---|---|---|---|
| 1a(1) | not weighted | | | 2e(6) | 0 | 1 | 0 |
| 2a(2) | 0 | 1 | 0 | 2f(7) | 0 | 1 | 0 |
| 2b(3) | 1 | 0 | 0 | 2g(8) | 1 | 0 | 0 |
| 2c(4) | 1 | 0 | 0 | 2h(9) | not weighted | | |
| 2d(5) | 1 | 0 | 0 | 3a(10) | 1 | 0 | 0 |
| 3b(11) | 2 | 0 | 0 | | | | |
| 3c(12) | 1 | 0 | 0 | | | | |
| 4a and 4b treated as one item NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0 | | | | | | | |

**Topic 8 - Recordkeeping Practices**

| | NO | YES | 8 | | NO | YES | 8 |
|---|---|---|---|---|---|---|---|
| 1a(1) | 1 | 0 | 0 | 1e(5) | 1 | 0 | 0 |
| 1b(2) | 1 | 0 | 0 | 1f(6) | not weighted | | |
| 1c(3) | 1 | 0 | 0 | 2a(7) | 3 | 0 | 0 |
| 1d(4) | 1 | 0 | 0 | | | | |

1a - not weighted
2a - 0% = 0 2-5% = 2
1-2% = 1 ≥ 5% = 3
3a - NO = 0 YES = 2 8 = 0

**Topic 10 - Representation of Status**

| | NO | YES | 8 |
|---|---|---|---|
| 1a(1) | 0 | 1 | 0 |
| 1b(2) | 0 | 1 | 0 |
| 1c(3) | 0 | 1 | 0 |
| 2a(4) | 2 | 0 | 0 |
| 2b(5) | 1 | 0 | 0 |
| 3a(6) | 3 | 0 | 0 |

| Field Name | Length | Raw Line/Bytes | Merged Bytes | Coding and Editing | Weighting - Item Responses |
|---|---|---|---|---|---|
| Topic 11 - Financial Stability | | | | yes = '1', no = '0', no response = '9' | treat 1a & 1b as one item, 1c & 1d as one item: NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0 |
| Items 1a-1d | 4 | 2/46-49 | 148-151 | -code as marked | |
| Item 2a | 1 | 2/50 | 152 | -if YES, code '8' to 3a-6b, go to topic 12 | NO YES 8<br>2a(1) not weighted<br>3a(2) 2 0 0<br>4a(3) 0 2 0<br>5a(4) 0 3 0<br>6a(5) 2 0 0<br>6b(6) 2 0 0 |
| Item 3a | 1 | 2/51 | 153 | -code as marked | |
| Item 4a | 1 | 2/52 | 154 | -code as marked | |
| Item 5a | 1 | 2/53 | 155 | -if no response, code '9' to 6a-6b, go to topic 12<br>-if NO, code '8' to 6a-6b, go to topic 12 | |
| Items 6a-6b | 2 | 2/54-55 | 156-157 | -code as marked | |
| Topic 12 - Instructional Programs | | | | yes = '1', no = '0', no response = '9', not required = '8' | treat 1a & 1b as one item: NO,NO = 3; YES,NO = 1; YES,YES = 0; NO,YES = 0<br>treat 2a & 2b as one item: NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0 |
| Items 1a-1b | 2 | 2/56-57 | 158-159 | -if no response to both, code '9' to 2a-2b, go to 3a<br>-if NO to both, code '8' to 2a-2b, go to 3a<br>-if NO and no response, code '9' to 2a-2b, go to 3a | NO YES 8<br>3a(1) 2 0 0<br>4a(2) 2 0 0<br>5a(3) 2 0 0<br>6a(4) 2 0 0<br>7a(5) 2 0 0<br>8a(6) 2 0 0 |
| Items 2a-2b | 2 | 2/58-59 | 160-161 | -code as marked | |
| Item 3a | 1 | 2/60 | 162 | -code as marked | |
| Item 4a | 1 | 2/61 | 163 | -code as marked | |
| Item 5a | 1 | 2/62 | 164 | -code as marked | |
| Item 6a | 1 | 2/63 | 165 | -code as marked | |
| Item 7a | 1 | 2/64 | 166 | -code as marked | |
| Item 8a | 1 | 2/65 | 167 | -code as marked | |
| Topic 13 - Instructional Facilities | | | | yes = '1', no = '0', no response = '9' | NO YES 8<br>1a(1) 2 0 0<br>treat 2a & 2b as one item: NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0<br>3a(2) 2 0 0<br>4a(3) 2 0 0 |
| Item 1a | 1 | 2/66 | 168 | -if no response, code '9' to 2a-2b, go to 3a<br>-if NO, code '8' to 2a-2b, go to 3a | |
| Items 2a-2b | 2 | 2/67-68 | 169-170 | -code as marked | |
| Item 3a | 1 | 2/69 | 171 | -code as marked | |
| Item 4a | 1 | 2/70 | 172 | -code as marked | |

SOURCE LISTING

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                /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORES    */  80.
                /*******************************************************************  90.
                ********************************************************************* 100.
                **                                                                  ** 110.
                ** IWEIGHT: THIS PROGRAM IS USED FOR BOTH DEGREE AND NON-DEGREE     ** 120.
                **          INSTITUTIONS TO WEIGHT EACH ITEM ON THE IRF.  FOR EACH  ** 130.
                **          TOPIC A TOPIC SCORE IS DEFINED AS THE SUM OF THE WEIGHTS** 140.
                **          DIVIDED BY THE N OF REAL RESPONSES.  A REAL RESPONSE    ** 150.
                **          IS ONE THAT IS ANSWERED EITHER YES, NO, OR A DIRECTED   ** 160.
                **          NON-RESPONSE (CODED AS '8'), NOT A MISSING DATA OF THE  ** 170.
                **          VARIETY THAT IS CODED '9'.                              ** 180.
                **          SPLIT HALF SCORES ARE ALSO DERIVED FOR EACH TOPIC AREA  ** 190.
                **          AND AN OVERALL IRF SCORE IS DEFINED AS THE SUM OF THE   ** 200.
                **          TOPIC WEIGHTS DIVIDED BY THE NUMBER OF TOPICS FOR WHICH ** 210.
                **          THERE WAS A NON-ZERO (REAL) N.                          ** 220.
                **          NOTE: IF THERE ARE NO VALID ITEMS FOR ANY TOPIC OR FOR  ** 230.
                **                ALL TOPICS, THE RELATED SCORES(TOTAL AND SPLIT    ** 240.
                **                HALVES) WILL BE ALL 9'S.                          ** 250.
                **          AN OUTPUT FILE WITH THE ORIGINAL ITEM DATA,TOPIC AND IRF** 260.
                **          WEIGHTS,N'S,SPLIT-HALF WEIGHTS AND N'S,TOPIC AND IRF    ** 270.
                **          SCORES IS DEVELOPED WHICH WILL BE MERGED WITH COMPOSITED** 280.
                **          ESO DATA TO FORM AN ANALYSIS FILE FOR PROJECT 52801     ** 290.
                **                                                                  ** 300.
                ** AUTHOR: NAOMI LEE BLOOM                  DATE: 12 MAY 1976      ** 310.
                **                                       REVISED: 17 SEPT 1976      ** 320.
                **                                                                  ** 330.
                ********************************************************************* 340.
                *********************************************************************/ 350.
                                                                                       360.
  1     0   IWEIGHT: PROC OPTIONS (MAIN);                                             370.
                                                                                       380.
  2     1 0     DCL MERGDAT FILE INPUT RECORD,                                       390.
                        WGHTDAT FILE OUTPUT RECORD;                                    400.
                                                                                       410.
  3     1 0     DCL (IN_CNT,OUT_CNT) PIC '99999' INIT (0);                           420.
                                                                                       430.
                                                                                       440.
  4     1 0     DCL P POINTER STATIC;                                                450.
  5     1 0     DCL 1 MERG_REC BASED (P),                                            460.
                      5 MID                CHAR(11),     /* BYTES 1-11          */ 470.
                      5 TOPIC1(16)         PIC '9',      /* BYTES 12-27 REFUND  */ 480.
                      5 TOPIC2(12)         PIC '9',      /* BYTES 28-39 ADVERT. */ 490.
                      5 TOPIC3(12)         PIC '9',      /* BYTES 40-51 ADMISSION*/ 500.
                      5 TOPIC4(12)         PIC '9',      /* BYTES 52-63 STAFF   */ 510.
                      5 TOPIC5(45)         PIC '9',      /* BYTES 64-108 DISCLOS.*/ 520.
                      5 TOPIC6(5)          PIC '9',      /* BYTES 109-113 ORIENT.*/ 530.
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                    5 TOPIC7(14)          PIC '9',      /* BYTES 114-127 JOBS    */  540.
                    5 TOPIC8(7)           PIC '9',      /* BYTES 128-134 RECORDS*/  550.
                    5 TOPIC9(7)           PIC '9',      /* BYTES 135-141 STABIL.*/  560.
                    5 TOPIC10(6)          PIC '9',      /* BYTES 142-147 STATUS */  570.
                    5 TOPIC11(10)         PIC '9',      /* BYTES 148-157 FINANC */  580.
                    5 TOPIC12(10)         PIC '9',      /* BYTES 158-167 PROGRAM*/  590.
                    5 TOPIC13(5)          PIC '9',      /* BYTES 168-172 FACILIT*/  600.
                    5 STATRATE            CHAR(8),      /* BYTES 173-180 RATING */  610.
                    5 NO_STUDENTS         PIC'9999',    /* BYTES 181-184 STUDS  */  620.
                    5 ACCRED              CHAR(1),      /* BYTE 185 ACCREDITA.  */  630.
                    5 AGE                 CHAR(1);      /* BYTE 186 AGE OF SCH. */  640.
                                                                                    650.
  6   1  0      DCL 1 MERG_REC_OVLAY BASED (P),                                     660.
                    5 MID                 CHAR(11),                               670.
                    5 TOPIC1_STR          CHAR(16),                               680.
                    5 TOPIC2_STR          CHAR(12),                               690.
                    5 TOPIC3_STR          CHAR(12),                               700.
                    5 TOPIC4_STR          CHAR(12),                               710.
                    5 TOPIC5_STR          CHAR(45),                               720.
                    5 TOPIC6_STR          CHAR(5),                                730.
                    5 TOPIC7_STR          CHAR(14),                               740.
                    5 TOPIC8_STR          CHAR(7),                                750.
                    5 TOPIC9_STR          CHAR(7),                                760.
                    5 TOPIC10_STR         CHAR(6),                                770.
                    5 TOPIC11_STR         CHAR(10),                               780.
                    5 TOPIC12_STR         CHAR(10),                               790.
                    5 TOPIC13_STR         CHAR(5),                                800.
                    5 STATRATE            CHAR(8);                                810.
                                                                                    820.
  7   1  0      DCL 1 TOTALS STATIC,                                                830.
                    5 TARRAY(4),                                                    840.
                        10 TWGT_SUM           FIXED(5,2),                       850.
                        10 T_N                FIXED(3,0),                       860.
                        10 T_SCORE            FIXED(6,0);                       870.
                  /* TARRAY(1) = SPLIT_HALF_A          TARRAY(3) = TOPIC      */  880.
                  /* TARRAY(2) = SPLIT_HALF_B          TARRAY(4) = IRF        */  890.
                                                                                    900.
  8   1  0      DCL 1 WGHT_REC STATIC,   /* LRECL= 816          */                  910.
                    5 MID                 CHAR(11),     /* BYTES 1-11           */  920.
                    5 TOPIC1(16)          PIC '9',      /* BYTES 12-27 REFUND   */  930.
                    5 TOPIC2(12)          PIC '9',      /* BYTES 28-39 ADVERT.  */  940.
                    5 TOPIC3(12)          PIC '9',      /* BYTES 40-51 ADMISSION*/  950.
                    5 TOPIC4(12)          PIC '9',      /* BYTES 52-63 STAFF    */  960.
                    5 TOPIC5(45)          PIC '9',      /* BYTES 64-108 DISCLOS.*/  970.
                    5 TOPIC6(5)           PIC '9',      /* BYTES 109-113 ORIENT.*/  980.
                    5 TOPIC7(14)          PIC '9',      /* BYTES 114-127 JOBS   */  990.
                    5 TOPIC8(7)           PIC '9',      /* BYTES 128-134 RECORDS*/ 1000.
                    5 TOPIC9(7)           PIC '9',      /* BYTES 135-141 STABIL,*/ 1010.
                    5 TOPIC10(6)          PIC '9',      /* BYTES 142-147 STATUS */ 1020.
```

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PL/I OPTIMIZING COMPILER          /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCO

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                        5 TOPIC11(10)          PIC '9',        /* BYTES 148-157 FINANC */  1030.
                        5 TOPIC12(10)          PIC '9',        /* BYTES 158-167 PROGRAM*/  1040.
                        5 TOPIC13(5)           PIC '9',        /* BYTES 168-172 FACILIT*/  1050.
                        5 STATRATE             CHAR(8),        /* BYTES 173-180 RATING */  1060.
                        5 NO_STUDENTS          PIC'9999',      /* BYTES 181-184 STUDS  */  1070.
                        5 ACCRED               CHAR(1),        /* BYTE 185 ACCREDITA,  */  1080.
                        5 AGE                  CHAR(1),        /* BYTE 186 AGE OF SCH. */  1090.
                        5 TOPIC_TOTALS(13),                    /* ONE PER TOPIC AREA   */  1100.
                            10 TTARRAY(3), /* SPLITA,SPLITB,TOPIC IN THAT ORDER   */  1110.
                                  15 WGT_SUM     PIC '9999V99',                          1120.
                                  15 N           PIC '999',                              1130.
                                  15 SCORE       PIC '999999V',                          1140.
                        5 IRF_WGT_SUM          PIC '9999V99',                          1150.
                        5 IRF_N                PIC '999',                              1160.
                        5 IRF_SCORE            PIC '999999V',                          1170.
                        5 IRFA_WGT_SUM         PIC '9999V99',                          1180.
                        5 IRFA_N               PIC '999',                              1190.
                        5 IRFA_SCORE           PIC '999999V',                          1200.
                        5 IRFB_WGT_SUM         PIC '9999V99',                          1210.
                        5 IRFB_N               PIC '999',                              1220.
                        5 IRFB_SCORE           PIC '999999V';                          1230.
                                                                                       1240.
      9   1   0     DCL WGTS(13,3,12)   FIXED(3,1) STATIC                             1250.
                        INIT  (2,2,1,0,2,1,1,0,0,1,0,0,                                1260.
                               0,0,0,0,0,0,0,0,1,0,0,0,                                1270.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1280.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1290.
                               2,1,1,2,2,1,1,1,1,1,0,0,                                1300.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1310.
                               0,0,0,0,3,1,1,1,0,1,1,1,                                1320.
                               1,3,2,0,0,0,0,0,0,0,0,0,                                1330.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1340.
                               3,0,0,2,0,0,3,1,1,1,1,1,                                1350.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1360.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1370.
                               1,1,.5,.5,.5,.5,.5,.5,.5,.5,0,2,                        1380.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1390.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1400.
                               3,1,1,1,1,0,0,0,0,0,0,0,                                1410.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1420.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1430.
                               0,0,1,1,1,0,0,1,0,1,2,1,                                1440.
                               0,1,0,0,0,1,1,0,0,0,0,0,                                1450.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1460.
                               1,1,1,1,1,0,3,0,0,0,0,0,                                1470.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1480.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1490.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1500.
                               0,0,0,0,0,0,0,0,0,0,0,0,                                1510.
```

E-3

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                                   /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORES

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                                   0,0,0,0,0,0,0,0,0,0,0,0,                                    1520.
                                   0,0,0,2,1,3,0,0,0,0,0,0,                                    1530.
                                   1,1,1,0,0,0,0,0,0,0,0,0,                                    1540.
                                   0,0,0,0,0,0,0,0,0,0,0,0,                                    1550.
                                   0,2,0,0,2,2,0,0,0,0,0,0,                                    1560.
                                   0,0,2,3,0,0,0,0,0,0,0,0,                                    1570.
                                   0,0,0,0,0,0,0,0,0,0,0,0,                                    1580.
                                   2,2,2,2,2,2,0,0,0,0,0,0,                                    1590.
                                   0,0,0,0,0,0,0,0,0,0,0,0,                                    1600.
                                   0,0,0,0,0,0,0,0,0,0,0,0,                                    1610.
                                   2,0,0,2,2,0,0,0,0,0,0,0,                                    1620.
                                   0,0,0,0,0,0,0,0,0,0,0,0,                                    1630.
                                   0,0,0,0,0,0,0,0,0,0,0,0);                                   1640.
                              /*****************************************************/         1650.
                              /*****************************************************/         1660.
                              /* THIS TABLE IS ORGANIZED AS FOLLOWS:                */         1670.
                              /*        FIRST DIMENSION(13) = TOPIC AREAS           */         1680.
                              /*        SECOND DIMENSION(3) = ANSWERS THAT ARE      */         1690.
                              /*            COUNTED AS REAL I.E. NO=1,YES=2,'8'=3   */         1700.
                              /*            SUBSCRIPTED BY J WITHIN CODE.           */         1710.
                              /*        THIRD DIMENSION(12) = ITEMS WITHIN TOPIC    */         1720.
                              /*****************************************************/         1730.
                              /*****************************************************/         1740.
                                                                                               1750.
    10   1  0      ON ENDFILE(MERGDAT) GO TO CLOSE_FILES;                                      1760.
                                                                                               1770.
    11   1  0      OPEN FILE(MERGDAT), FILE(WGHTDAT);                                          1780.
    12   1  0      PUT SKIP(2) EDIT ('ALL FILES OPENED') (X(10),A);                            1790.
                                                                                               1800.
    13   1  0  READ_MERGDAT:                                                                   1810.
                   READ FILE (MERGDAT) SET (P);                                                1820.
    14   1  0      IN_CNT = IN_CNT + 1;                                                        1830.
    15   1  0      DO I = 1 TO 4;          /* RESET TOTALS ARRAY          */                   1840.
    16   1  1           TWGT_SUM(I) = 0;                                                       1850.
    17   1  1           T_N(I) = 0;                                                            1860.
    18   1  1           T_SCORE(I) = 0;                                                        1870.
    19   1  1      END;                                                                        1880.
                   /*     RESET TOTAL FIELDS IN OUTPUT RECORD                 */             1890.
    20   1  0      IRF_WGT_SUM = 0;                                                            1900.
    21   1  0      IRF_N = 0;                                                                  1910.
    22   1  0      IRF_SCORE = 0;                                                              1920.
    23   1  0      IRFA_WGT_SUM = 0;                                                           1930.
    24   1  0      IRFA_N = 0;                                                                 1940.
    25   1  0      IRFA_SCORE = 0;                                                             1950.
    26   1  0      IRFB_WGT_SUM = 0;                                                           1960.
    27   1  0      IRFB_N = 0;                                                                 1970.
    28   1  0      IRFB_SCORE = 0;                                                             1980.
    29   1  0      DO I = 1 TO 13;                                                             1990.
    30   1  1           DO J = 1 TO 3;                                                         2000.
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PL/I OPTIMIZING COMPILER          /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SC

STMT LEV NT

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STMT LEV NT

   71   1  2          END;                                                          2500.
   72   1  1          ELSE T_SCORE(I) = 999999;                                     2510.
   73   1  1          WGT_SUM(1,I) = TWGT_SUM(I);                                   2520.
   74   1  1          N(1,I)       = T_N(I);                                        2530.
   75   1  1          SCORE(1,I)   = T_SCORE(I);                                    2540.
   76   1  1          TWGT_SUM(I)  = 0;                                             2550.
   77   1  1          T_N(I)       = 0;                                             2560.
   78   1  1          T_SCORE(I)   = 0;                                             2570.
   79   1  1      END;                                                              2580.
                                                                                   2590.
                /*  PROCESS TOPIC2 - ADVERTISING                              */   2600.
   80   1  0      K = 1;          /* SPLIT HALF INDICATOR                      */   2610.
   81   1  0      DO I = 1 TO 10;      /* PROCESS ITEMS 1A-2F                  */   2620.
   82   1  1          IF MERG_REC.TOPIC2(I) ¬= 9 THEN DO;                           2630.
   83   1  2              IF MERG_REC.TOPIC2(I) = 8 THEN J = 3;                     2640.
   84   1  2                  ELSE J = MERG_REC.TOPIC2(I) + 1;                      2650.
   85   1  2              T_N(3) = T_N(3) + 1;                                      2660.
   86   1  2              T_N(K) = T_N(K) + 1;                                      2670.
   87   1  2              TWGT_SUM(3) = TWGT_SUM(3) + WGTS(2,J,I);                  2680.
   88   1  2              TWGT_SUM(K) = TWGT_SUM(K) + WGTS(2,J,I);                  2690.
   89   1  2              K = K + 1;                                                2700.
   90   1  2              IF K > 2 THEN K = 1;                                      2710.
   91   1  2          END;                                                          2720.
   92   1  1      END;                                                              2730.
                /* PROCESS ITEMS 3A AND 3B AS ONE RESPONSE                   */   2740.
   93   1  0      IF MERG_REC.TOPIC2(11) = 9 & MERG_REC.TOPIC2(12) = 9            2750.
                    THEN GO TO FINISH_TOPIC2;                                      2760.
   94   1  0      T_N(3) = T_N(3) + 1;                                            2770.
   95   1  0      T_N(K) = T_N(K) + 1;                                            2780.
   96   1  0      IF SUBSTR(TOPIC2_STR,11,2) = '11' | SUBSTR(TOPIC2_STR,11,2) = '01'  2790.
                    THEN GO TO FINISH_TOPIC2;                                      2800.
                    /* YES,YES AND NO,YES = WGT OF ZERO                      */   2810.
   97   1  0      IF SUBSTR(TOPIC2_STR,11,2) = '10' THEN DO;                      2820.
   98   1  1          TWGT_SUM(3) = TWGT_SUM(3) + 1;                              2830.
   99   1  1          TWGT_SUM(K) = TWGT_SUM(K) + 1;                              2840.
  100   1  1          GO TO FINISH_TOPIC2;                                        2850.
  101   1  1          END;                                                        2860.
  102   1  0      IF SUBSTR(TOPIC2_STR,11,2) = '00' THEN DO;                      2870.
  103   1  1          TWGT_SUM(3) = TWGT_SUM(3) + 3;                              2880.
  104   1  1          TWGT_SUM(K) = TWGT_SUM(K) + 3;                              2890.
  105   1  1          GO TO FINISH_TOPIC2;                                        2900.
  106   1  1          END;                                                        2910.
                                                                                   2920.
  107   1  0  FINISH_TOPIC2;                                                      2930.
                DO I = 1 TO 3;                                                     2940.
  108   1  1          IF T_N(I) > 0 THEN DO;                                      2950.
  109   1  2              T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) +  5;        2960.
  110   1  2          END;                                                        2970.
  111   1  1          ELSE T_SCORE(I) = 999999;                                   2980.
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PL/I OPTIMIZING COMPILER          /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORE

   STMT LEV NT

    112   1  1          WGT_SUM(2,I) = TWGT_SUM(I);                                          2990.
    113   1  1          N(2,I)       = T_N(I);                                               3000.
    114   1  1          SCORE(2,I)   = T_SCORE(I);                                           3010.
    115   1  1          TWGT_SUM(I)  = 0;                                                    3020.
    116   1  1          T_N(I)       = 0;                                                    3030.
    117   1  1          T_SCORE(I)   = 0;                                                    3040.
    118   1  1     END;                                                                      3050.
                                                                                           3060.
                  /*  PROCESS TOPIC3 - ADMISSIONS POLICIES                          */       3070.
    119   1  0     K = 1;          /* SPLIT HALF INDICATOR                          */       3080.
    120   1  0     DO I = 1,2,3,4,5,6,7,8,10,11,12;   /* PROCESS ITEMS 1A-6C EXCEPT*/       3090.
                                                     /* DON'T PROCESS 5A          */       3100.
    121   1  1          IF MERG_REC.TOPIC3(I) ¬= 9 THEN DO;                                  3110.
    122   1  2               IF MERG_REC.TOPIC3(I) = 8 THEN J = 3;                           3120.
    123   1  2                    ELSE J = MERG_REC.TOPIC3(I) + 1;                           3130.
    124   1  2               T_N(3) = T_N(3) + 1;                                            3140.
    125   1  2               T_N(K) = T_N(K) + 1;                                            3150.
    126   1  2               IWGT_SUM(3) = TWGT_SUM(3) + WGTS(3,J,I);                        3160.
    127   1  2               TWGT_SUM(K) = TWGT_SUM(K) + WGTS(3,J,I);                        3170.
    128   1  2               K = K + 1;                                                      3180.
    129   1  2               IF K > 2 THEN K = 1;                                            3190.
    130   1  2          END;                                                                 3200.
    131   1  1     END;                                                                      3210.
                                                                                           3220.
                  /*   FINISH TOPIC3          */                                          3230.
    132   1  0     DO I = 1 TO 3;                                                           3240.
    133   1  1          IF T_N(I) > 0 THEN DO;                                              3250.
    134   1  2               T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;               3260.
    135   1  2          END;                                                                 3270.
    136   1  1          ELSE T_SCORE(I) = 999999;                                           3280.
    137   1  1          WGT_SUM(3,I) = TWGT_SUM(I);                                         3290.
    138   1  1          N(3,I)       = T_N(I);                                              3300.
    139   1  1          SCORE(3,I)   = T_SCORE(I);                                          3310.
    140   1  1          TWGT_SUM(I)  = 0;                                                   3320.
    141   1  1          T_N(I)       = 0;                                                   3330.
    142   1  1          T_SCORE(I)   = 0;                                                   3340.
    143   1  1     END;                                                                     3350.
                                                                                           3360.
                  /*  PROCESS TOPIC4 - INSTRUCTIONAL STAFF                          */       3370.
    144   1  0     K = 1;                          /* SPLIT HALF INDICATOR          */       3380.
                  /* COUNT NO'S IN 2A,2B,2D,2E                                     */       3390.
    145   1  0     L = 0;                          /* WHERE L IS NUMBER OF NO'S     */       3400.
    146   1  0     DO I = 1,2,4,5;                                                          3410.
    147   1  1          IF MERG_REC.TOPIC4(I) = 0 THEN L = L + 1;                           3420.
    148   1  1     END;                                                                     3430.
                  /* PROCESS 1A- 4D EXCEPT 2A,2B,2D,AND 2F                         */       3440.
                  /* ALSO SKIP 2F WHICH IS NOT WEIGHTED                            */       3450.
    149   1  0     DO I = 1,4,8,9,10,11,12;                                                 3460.
    150   1  1          IF MERG_REC.TOPIC4(I) ¬= 9 THEN DO;                                 3470.
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                        /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORES

STMT LEV NT

                                IF MERG_REC.TOPIC4(I) = 8 THEN J = 3;                    3480.
                                    ELSE J = MERG_REC.TOPIC4(I) + 1;                     3490.
                                T_N(3) = T_N(3) + 1;                                     3500.
                                T_N(K) = T_N(K) + 1;                                     3510.
                                TWGT_SUM(3) = TWGT_SUM(3) + WGTS(4,J,I);                 3520.
                                TWGT_SUM(K) = TWGT_SUM(K) + WGTS(4,J,I);                 3530.
                                K = K + 1;                                               3540.
                                IF K > 2 THEN K = 1;                                     3550.
                            END;                                                         3560.
                        END;                                                             3570.
                        /* WEIGHT ITEMS 2A,2B,2D,AND 2E AS ONE ITEM                 */  3580.
                        IF SUBSTR(TOPIC4_STR,2,2) = '99' & SUBSTR(TOPIC4_STR,5,2) = '99'  3590.
                            THEN GO TO FINISH_TOPIC4;                                    3600.
                        T_N(3) = T_N(3) + 1;                                             3610.
                        T_N(K) = T_N(K) + 1;                                             3620.
                        IF L < 3 THEN GO TO FINISH_TOPIC4;      /* WEIGHT IS ZERO    */  3630.
                        TWGT_SUM(3) = TWGT_SUM(3) + (L - 2);                             3640.
                        TWGT_SUM(K) = TWGT_SUM(K) + (L - 2);                             3650.
                                                                                         3660.
                    FINISH_TOPIC4:                                                       3670.
                        DO I = 1 TO 3;                                                   3680.
                            IF T_N(I) > 0 THEN DO;                                       3690.
                                T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;         3700.
                            END;                                                         3710.
                            ELSE T_SCORE(I) = 999999;                                    3720.
                            WGT_SUM(4,I) = TWGT_SUM(I);                                  3730.
                            N(4,I) = T_N(I);                                             3740.
                            SCORE(4,I) = T_SCORE(I);                                     3750
                            TWGT_SUM(I) = 0;                                             3760.
                            T_N(I) = 0;                                                  3770.
                            T_SCORE(I) = 0;                                              3780.
                        END;                                                             3790.
                                                                                         3800.
                    /*  PROCESS TOPIC5 - WRITTEN DISCLOSURE                      */      3810.
                        K = 1;                          /* SPLIT HALF INDICATOR     */  3820.
                        /* PROCESS ITEMS 1A - 1Y                                    */  3830.
                        DO I = 1 TO 25;                                                  3840.
                            IF MERG_REC.TOPIC5(I) ¬= 9 THEN DO;                          3850.
                                T_N(3) = T_N(3) + 1;                                     3860.
                                T_N(K) = T_N(K) + 1;                                     3870.
                                IF MERG_REC.TOPIC5(I) = 0 THEN DO;                       3880.
                                    TWGT_SUM(3) = TWGT_SUM(3) + .5;                      3890.
                                    TWGT_SUM(K) = TWGT_SUM(K) + .5;                      3900.
                                END;                                                     3910.
                                K = K + 1;                                               3920.
                                IF K > 2 THEN K = 1;                                     3930.
                            END;                                                         3940.
                        END;                                                             3950.
                        /* PROCESS ITEMS 2A - 4A EXCEPT 3A AND 5A WHICH AREN'T WEIGHTED */ 3960.
```

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                    /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORE
STMT LEV NT

  192   1  0     DO I = 1,2,3,4,5,6,7,8,9,10,12;                                  3970.
  193   1  1        IF MERG_REC.TOPIC5(I + 25) ¬= 9 THEN DO;                      3980.
  194   1  2           IF MERG_REC.TOPIC5(I + 25) = 8 THEN J = 3;                 3990.
  195   1  2              ELSE J = MERG_REC.TOPIC5(I+25) + 1;                     4000.
  196   1  2           T_N(3) = T_N(3) + 1;                                       4010.
  197   1  2           T_N(K) = T_N(K) + 1;                                       4020.
  198   1  2           TWGT_SUM(3) = TWGT_SUM(3) + WGTS(5,J,I);                   4030.
  199   1  2           TWGT_SUM(K) = TWGT_SUM(K) + WGTS(5,J,I);                   4040.
  200   1  2           K = K + 1;                                                 4050.
  201   1  2           IF K > 2 THEN K = 1;                                       4060.
  202   1  2        END;                                                          4070.
  203   1  1     END;                                                             4080.
                                                                                 4090.
                    /* PROCESS ITEMS 6A - 6G                                 */   4100.
  204   1  0     DO I = 1 TO 7;                                                   4110.
  205   1  1        IF MERG_REC.TOPIC5(38 + I) ¬= 9 THEN DO;                      4120.
  206   1  2           T_N(3) = T_N(3) + 1;                                       4130.
  207   1  2           T_N(K) = T_N(K) + 1;                                       4140.
  208   1  2           IF MERG_REC.TOPIC5(38+I) = 0 THEN DO;                      4150.
  209   1  3              TWGT_SUM(3) = TWGT_SUM(3) + 1;                          4160.
  210   1  3              TWGT_SUM(K) = TWGT_SUM(K) + 1;                          4170.
  211   1  3           END;                                                       4180.
  212   1  2           K = K + 1;                                                 4190.
  213   1  2           IF K > 2 THEN K = 1;                                       4200.
  214   1  2        END;                                                          4210.
  215   1  1     END;                                                             4220.
                                                                                 4230.
                 /*   FINISH TOPICS          */                                 4240.
  216   1  0     DO I = 1 TO 3;                                                   4250.
  217   1  1        IF T_N(I) > 0 THEN DO;                                        4260.
  218   1  2           T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;           4270.
  219   1  2        END;                                                          4280.
  220   1  1        ELSE T_SCORE(I) = 999999;                                     4290.
  221   1  1        WGT_SUM(5,I) = TWGT_SUM(I);                                   4300.
  222   1  1        N(5,I) = T_N(I);                                              4310.
  223   1  1        SCORE(5,I) = T_SCORE(I);                                      4320.
  224   1  1        TWGT_SUM(I) = 0;                                              4330.
  225   1  1        T_N(I) = 0;                                                   4340.
  226   1  1        T_SCORE(I) = 0;                                               4350.
  227   1  1     END;                                                             4360.
                                                                                 4370.
                 /*  PROCESS TOPIC6 - STUDENT ORIENTATION                   */   4380.
  228   1  0      K = 1;                        /* SPLIT HALF INDICATOR      */   4390.
                 /* PROCESS ITEMS 1A - 2D                                  */   4400.
  229   1  0     DO I = 1 TO 5;                                                   4410.
  230   1  1        IF MERG_REC.TOPIC6(I) ¬= 9 THEN DO;                           4420.
  231   1  2           IF MERG_REC.TOPIC6(I) = 8 THEN J = 3;                      4430.
  232   1  2              ELSE J = MERG_REC.TOPIC6(I) + 1;                        4440.
  233   1  2           T_N(3) = T_N(3) + 1;                                       4450.
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PL/I OPTIMIZING COMPILER          /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORES

    STMT LEV NT

     234   1  2                  T_N(K) = T_N(K) + 1;                                          4460.
     235   1  2                  TWGT_SUM(3) = TWGT_SUM(3) + WGTS(6,J,I);                      4470.
     236   1  2                  TWGT_SUM(K) = TWGT_SUM(K) + WGTS(6,J,I);                      4480.
     237   1  2                  K = K + 1;                                                    4490.
     238   1  2                  IF K > 2 THEN K = 1;                                          4500.
     239   1  2               END;                                                             4510.
     240   1  1          END;                                                                  4520.
                                                                                              4530.
                       /*  FINISH TOPIC6                    */                               4540.
     241   1  0          DO I = 1 TO 3;                                                        4550.
     242   1  1               IF T_N(I) > 0 THEN DO;                                           4560.
     243   1  2                    T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;            4570.
     244   1  2               END;                                                             4580.
     245   1  1               ELSE T_SCORE(I) = 999999;                                        4590.
     246   1  1               WGT_SUM(6,I) = TWGT_SUM(I);                                      4600.
     247   1  1               N(6,I) = T_N(I);                                                 4610.
     248   1  1               SCORE(6,I) = T_SCORE(I);                                         4620.
     249   1  1               TWGT_SUM(I) = 0;                                                 4630.
     250   1  1               T_N(I) = 0;                                                      4640.
     251   1  1               T_SCORE(I) = 0;                                                  4650.
     252   1  1          END;                                                                  4660.
                                                                                              4670.
                       /*  PROCESS TOPIC7 - JOB PLACEMENT AND FOLLOWUP              */       4680.
     253   1  0          K = 1;                        /* SPLIT HALF INDICATOR          */   4690.
                          /* PROCESS ITEMS 1A - 3C EXCEPT 1A AND 2H                   */   4700.
     254   1  0          DO I = 2,3,4,5,6,7,8,10,11,12;                                       4710.
     255   1  1               IF MERG_REC.TOPIC7(I) ¬= 9 THEN DO;                             4720.
     256   1  2                    IF MERG_REC.TOPIC7(I) = 8 THEN J = 3;                      4730.
     257   1  2                         ELSE J = MERG_REC.TOPIC7(I) + 1;                      4740.
     258   1  2                    T_N(3) = T_N(3) + 1;                                       4750.
     259   1  2                    T_N(K) = T_N(K) + 1;                                       4760.
     260   1  2                    TWGT_SUM(3) = TWGT_SUM(3) + WGTS(7,J,I);                   4770.
     261   1  2                    TWGT_SUM(K) = TWGT_SUM(K) + WGTS(7,J,I);                   4780.
     262   1  2                    K = K + 1;                                                 4790.
     263   1  2                    IF K > 2 THEN K = 1;                                       4800.
     264   1  2               END;                                                            4810.
     265   1  1          END;                                                                 4820.
                          /* PROCESS ITEMS 4A AND 4B AS ONE RESPONSE                  */   4830.
     266   1  0          IF MERG_REC.TOPIC7(13) = 9 & MERG_REC.TOPIC7(14) = 9                 4840.
                               THEN GO TO FINISH_TOPIC7;                                      4850.
     267   1  0          T_N(3) = T_N(3) + 1;                                                 4860.
     268   1  0          T_N(K) = T_N(K) + 1;                                                 4870.
     269   1  0          IF SUBSTR(TOPIC7_STR,13,2) = '11' | SUBSTR(TOPIC7_STR,13,2) = '01'  4880.
                               THEN GO TO FINISH_TOPIC7;                                      4890.
                               /* YES,YES AND NO,YES HAVE A WEIGHT OF ZERO                 */   4900.
     270   1  0          IF SUBSTR(TOPIC7_STR,13,2) =  '00' THEN DO;                          4910.
     271   1  1               TWGT_SUM(3) = TWGT_SUM(3) + 2;                                 4920.
     272   1  1               TWGT_SUM(K) = TWGT_SUM(K) + 2;                                 4930.
     273   1  1               GO TO FINISH_TOPIC7;                                           4940.
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STMT LEV NT

  274   1  1          END;                                                          4950.
  275   1  0      IF SUBSTR(TOPIC7_STR,13,2) = '10' THEN DO;                        4960.
  276   1  1          TWGT_SUM(3) = TWGT_SUM(3) + 1;                                4970.
  277   1  1          TWGT_SUM(K) = TWGT_SUM(K) + 1;                                4980.
  278   1  1          GO TO FINISH_TOPIC7;                                          4990.
  279   1  1          END;                                                          5000.
                                                                                   5010.
  280   1  0  FINISH_TOPIC7;                                                       5020.
               DO I = 1 TO 3;                                                      5030.
  281   1  1          IF T_N(I) > 0 THEN DO;                                        5040.
  282   1  2              T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;          5050.
  283   1  2          END;                                                          5060.
  284   1  1          ELSE T_SCORE(I) = 999999;                                     5070.
  285   1  1          WGT_SUM(7,I) = TWGT_SUM(I);                                   5080.
  286   1  1          N(7,I)       = T_N(I);                                        5090.
  287   1  1          SCORE(7,I)   = T_SCORE(I);                                    5100.
  288   1  1          TWGT_SUM(I)  = 0;                                             5110.
  289   1  1          T_N(I)       = 0;                                             5120.
  290   1  1          T_SCORE(I)   = 0;                                             5130.
  291   1  1      END;                                                              5140.
                                                                                   5150.
                  /*  PROCESS TOPIC8 - RECORDKEEPING PRACTISES                */   5160.
  292   1  0      K = 1;                      /* SPLIT HALF INDICATOR            */ 5170.
                  /* PROCESS ALL ITEMS EXCEPT IF WHICH ISN'T WEIGHTED          */ 5180.
  293   1  0      DO I = 1,2,3,4,5,7;                                             5190.
  294   1  1          IF MERG_REC.TOPIC8(I) ^= 9 THEN DO;                         5200.
  295   1  2              IF MERG_REC.TOPIC8(I) = 0 THEN J = 3;                   5210.
  296   1  2                  ELSE J = MERG_REC.TOPIC8(I) + 1;                    5220.
  297   1  2              T_N(3) = T_N(3) + 1;                                    5230.
  298   1  2              T_N(K) = T_N(K) + 1;                                    5240.
  299   1  2              TWGT_SUM(3) = TWGT_SUM(3) + WGTS(8,J,I);                5250.
  300   1  2              TWGT_SUM(K) = TWGT_SUM(K) + WGTS(8,J,I);                5260.
  301   1  2              K = K + 1;                                              5270.
  302   1  2              IF K > 2 THEN K = 1;                                    5280.
  303   1  2          END;                                                        5290.
  304   1  1      END;                                                            5300.
                                                                                   5310.
                  /*   FINISH TOPIC8          */                                 5320.
  305   1  0      DO I = 1 TO 3;                                                  5330.
  306   1  1          IF T_N(I) > 0 THEN DO;                                      5340.
  307   1  2              T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;        5350.
  308   1  2          END;                                                        5360.
  309   1  1          ELSE T_SCORE(I) = 999999;                                   5370.
  310   1  1          WGT_SUM(8,I) = TWGT_SUM(I);                                 5380.
  311   1  1          N(8,I)       = T_N(I);                                      5390.
  312   1  1          SCORE(8,I)   = T_SCORE(I);                                  5400.
  313   1  1          TWGT_SUM(I)  = 0;                                           5410.
  314   1  1          T_N(I)       = 0;                                           5420.
  315   1  1          T_SCORE(I)   = 0;                                           5430.
```

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 316   1  1     END;                                                                  5440.
                                                                                     5450.
              /*  PROCESS TOPIC9 = STAFF STABILITY                          */       5460.
 317   1  0     K = 1;                          /* SPLIT HALF INDICATOR      */      5470.
               /* PROCESS 2A - 1A IS NOT WEIGHTED                           */      5480.
 318   1  0     IF SUBSTR(TOPIC9_STR,4,3) = '999' THEN;     /* MISSING DATA  */      5490.
 319   1  0          ELSE DO;                                                        5500.
 320   1  1               T_N(3) = T_N(3) + 1;                                       5510.
 321   1  1               T_N(K) = T_N(K) + 1;                                       5520.
 322   1  1               IF SUBSTR(TOPIC9_STR,4,3) = '000' THEN J = 0;              5530.
 323   1  1                    ELSE IF SUBSTR(TOPIC9_STR,4,3) < '002' THEN J = 1;    5540.
 324   1  1                    ELSE IF SUBSTR(TOPIC9_STR,4,3) < '005' THEN J = 2;    5550.
 325   1  1                    ELSE J = 3;                                           5560.
 326   1  1               TWGT_SUM(3) = TWGT_SUM(3) + J;                             5570.
 327   1  1               TWGT_SUM(K) = TWGT_SUM(K) + J;                             5580.
 328   1  1               K = K + 1;                                                 5590.
 329   1  1               IF K > 2 THEN K = 1;                                       5600.
 330   1  1          END;                                                            5610.
                                                                                     5620.
               /* PROCESS ITEM 3A                                           */      5630.
 331   1  0     IF MERG_REC.TOPIC9(7) = 9 THEN GO TO FINISH_TOPIC9;                   5640.
 332   1  0     T_N(3) = T_N(3) + 1;                                                  5650.
 333   1  0     T_N(K) = T_N(K) + 1;                                                  5660.
 334   1  0     IF MERG_REC.TOPIC9(7) = 8 | MERG_REC.TOPIC9(7) = 0 THEN J = 0;        5670.
 335   1  0          ELSE J = 2;                                                     5680.
 336   1  0     TWGT_SUM(3) = TWGT_SUM(3) + J;                                        5690.
 337   1  0     TWGT_SUM(K) = TWGT_SUM(K) + J;                                        5700.
                                                                                     5710.
 338   1  0   FINISH_TOPIC9:                                                        5720.
               DO I = 1 TO 3;                                                        5730.
 339   1  1          IF T_N(I) > 0 THEN DO;                                         5740.
 340   1  2               T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;          5750.
 341   1  2          END;                                                           5760.
 342   1  1          ELSE T_SCORE(I) = 999999;                                      5770.
 343   1  1          WGT_SUM(9,I) = TWGT_SUM(I);                                    5780.
 344   1  1          N(9,I)       = T_N(I);                                         5790.
 345   1  1          SCORE(9,I)   = T_SCORE(I);                                     5800.
 346   1  1          TWGT_SUM(I)  = 0;                                              5810.
 347   1  1          T_N(I)       = 0;                                              5820.
 348   1  1          T_SCORE(I)   = 0;                                              5830.
 349   1  1     END;                                                                5840.
              /*  PROCESS TOPIC10 = STATUS REPRESENTATION                   */      5850.
 350   1  0     K = 1;                          /* SPLIT HALF INDICATOR      */      5860.
 351   1  0     DO I = 1 TO 6;                                                      5870.
 352   1  1          IF MERG_REC.TOPIC10(I) ¬= 9 THEN DO;                           5880.
 353   1  2               IF MERG_REC.TOPIC10(I) = 8 THEN J = 3;                    5890.
 354   1  2                    ELSE J = MERG_REC.TOPIC10(I) + 1;                    5900.
 355   1  2               T_N(3) = T_N(3) + 1;                                      5910.
 356   1  2               T_N(K) = T_N(K) + 1;                                      5920.
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  357   1  2                TWGT_SUM(3) = TWGT_SUM(3) + WGTS(10,J,I);                    5930.
  358   1  2                TWGT_SUM(K) = TWGT_SUM(K) + WGTS(10,J,I);                    5940.
  359   1  2                K = K + 1;                                                   5950.
  360   1  2                IF K > 2 THEN K = 1;                                         5960.
  361   1  2             END;                                                            5970.
  362   1  1          END;                                                               5980.
                                                                                       5990.
                     /*  FINISH TOPIC10          */                                    6000.
  363   1  0          DO I = 1 TO 3;                                                     6010.
  364   1  1             IF T_N(I) > 0 THEN DO;                                          6020.
  365   1  2                T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;             6030.
  366   1  2             END;                                                            6040.
  367   1  1             ELSE T_SCORE(I) = 999999;                                       6050.
  368   1  1             WGT_SUM(10,I) = TWGT_SUM(I);                                    6060.
  369   1  1             N(10,I)       = T_N(I);                                         6070.
  370   1  1             SCORE(10,I)   = T_SCORE(I);                                     6080.
  371   1  1             TWGT_SUM(I)   = 0;                                              6090.
  372   1  1             T_N(I)        = 0;                                              6100.
  373   1  1             T_SCORE(I)    = 0;                                              6110.
  374   1  1          END;                                                               6120.
                     /*  PROCESS TOPIC11 - FINANCIAL STABILITY                  */     6130.
  375   1  0          K = 1;                          /* SPLIT HALF INDICATOR       */ 6140.
                     /* PROCESS ITEMS 1A AND 1B AS ONE RESPONSE                     */ 6150.
  376   1  0          IF MERG_REC.TOPIC11(1) = 9 & MERG_REC.TOPIC11(2) = 9 THEN;      6160.
  377   1  0             ELSE DO;                                                        6170.
  378   1  1                T_N(3) = T_N(3) + 1;                                         6180.
  379   1  1                T_N(K) = T_N(K) + 1;                                         6190.
  380   1  1                IF SUBSTR(TOPIC11_STR,1,2) = '11' |                          6200.
                               SUBSTR(TOPIC11_STR,1,2) = '01' THEN J = 0;              6210.
  381   1  1                ELSE IF SUBSTR(TOPIC11_STR,1,2) = '10' THEN J = 1;          6220.
  382   1  1                ELSE J = 2;                                                  6230.
  383   1  1                TWGT_SUM(3) = TWGT_SUM(3) + J;                               6240.
  384   1  1                TWGT_SUM(K) = TWGT_SUM(K) + J;                               6250.
  385   1  1                K = K + 1;                                                   6260.
  386   1  1                IF K > 2 THEN K = 1;                                         6270.
  387   1  1             END;                                                            6280.
                                                                                       6290.
                     /* PROCESS ITEMS 1C AND 1D AS ONE RESPONSE                     */ 6300.
  388   1  0          IF MERG_REC.TOPIC11(3) = 9 & MERG_REC.TOPIC11(4) = 9 THEN;      6310.
  389   1  0             ELSE DO;                                                        6320.
  390   1  1                T_N(3) = T_N(3) + 1;                                         6330.
  391   1  1                T_N(K) = T_N(K) + 1;                                         6340.
  392   1  1                IF SUBSTR(TOPIC11_STR,3,2) = '11' |                          6350.
                               SUBSTR(TOPIC11_STR,3,2) = '01' THEN J = 0;              6360.
  393   1  1                ELSE IF SUBSTR(TOPIC11_STR,3,2) = '10' THEN J = 1;          6370.
  394   1  1                ELSE J = 2;                                                  6380.
  395   1  1                TWGT_SUM(3) = TWGT_SUM(3) + J;                               6390.
  396   1  1                TWGT_SUM(K) = TWGT_SUM(K) + J;                               6400.
  397   1  1                K = K + 1;                                                   6410.
```

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PL/I OPTIMIZING COMPILER          /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORES

    STMT LEV NT

     398    1  1                IF K > 2 THEN K = 1;                                          6420.
     399    1  1             END;                                                             6430.
                                                                                             6440.
                    /* PROCESS ITEMS 2A - 6B EXCEPT 2A                                   */  6450.
     400    1  0        DO I = 2 TO 6;                                                       6460.
     401    1  1             IF MERG_REC.TOPIC11(4+I) ¬= 9 THEN DO;                          6470.
     402    1  2                  IF MERG_REC.TOPIC11(4+I) = 8 THEN J = 3;                   6480.
     403    1  2                      ELSE J = MERG_REC.TOPIC11(4+I) + 1;                    6490.
     404    1  2                  T_N(3) = T_N(3) + 1;                                       6500.
     405    1  2                  T_N(K) = T_N(K) + 1;                                       6510.
     406    1  2                  TWGT_SUM(3) = TWGT_SUM(3) + WGTS(11,J,I);                  6520.
     407    1  2                  TWGT_SUM(K) = TWGT_SUM(K) + WGTS(11,J,I);                  6530.
     408    1  2                  K = K + 1;                                                 6540.
     409    1  2                  IF K > 2 THEN K = 1;                                       6550.
     410    1  2             END;                                                            6560.
     411    1  1        END;                                                                 6570.
                                                                                             6580.
                    /*  FINISH TOPIC11          */                                         6590.
     412    1  0        DO I = 1 TO 3;                                                       6600.
     413    1  1             IF T_N(I) > 0 THEN DO;                                          6610.
     414    1  2                  T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;           6620.
     415    1  2             END;                                                            6630.
     416    1  1             ELSE T_SCORE(I) = 999999;                                       6640.
     417    1  1             WGT_SUM(11,I) = TWGT_SUM(I);                                    6650.
     418    1  1             N(11,I)       = T_N(I);                                         6660.
     419    1  1             SCORE(11,I)   = T_SCORE(I);                                     6670.
     420    1  1             TWGT_SUM(I)   = 0;                                              6680.
     421    1  1             T_N(I)        = 0;                                              6690.
     422    1  1             T_SCORE(I)    = 0;                                              6700.
     423    1  1        END;                                                                 6710.
                                                                                             6720.
                                                                                             6730.
                    /*  PROCESS TOPIC12 - INSTRUCTIONAL PROGRAMS                          */  6740.
     424    1  0        K = 1;                          /* SPLIT HALF INDICATOR           */  6750.
                        /* PROCESS 1A AND 1P AS ONE RESPONSE                             */  6760.
     425    1  0        IF SUBSTR(TOPIC12_STR,1,2) = '99' THEN;                              6770.
     426    1  0             ELSE DO;                                                        6780.
     427    1  1                  T_N(3) = T_N(3) + 1;                                       6790.
     428    1  1                  T_N(K) = T_N(K) + 1;                                       6800.
     429    1  1                  IF SUBSTR(TOPIC12_STR,1,2) = '11' |                        6810.
                                      SUBSTR(TOPIC12_STR,1,2) = '01' THEN J = 0;            6820.
     430    1  1                  ELSE IF SUBSTR(TOPIC12_STR,1,2) = '10' THEN J = 1;         6830.
     431    1  1                  ELSE J = 3;                                                6840.
     432    1  1                  TWGT_SUM(3) = TWGT_SUM(3) + J;                             6850.
     433    1  1                  TWGT_SUM(K) = TWGT_SUM(K) + J;                             6860.
     434    1  1                  K = K + 1;                                                 6870.
     435    1  1                  IF K > 2 THEN K = 1;                                       6880.
     436    1  1             END;                                                            6890.
                                                                                             6900.
```

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PL/I OPTIMIZING COMPILER          /*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORE

   STMT LEV NT

                        /* PROCESS ITEMS 2A AND 2B AS ONE RESPONSE                          */  6910.
     437   1  0          IF SUBSTR(TOPIC12_STR,3,2) = '99' THEN;                                 6920.
     438   1  0              ELSE DO;                                                            6930.
     439   1  1                   T_N(3) = T_N(3) + 1;                                           6940.
     440   1  1                   T_N(K) = T_N(K) + 1;                                           6950.
     441   1  1                   IF SUBSTR(TOPIC12_STR,3,2) = '11' |                            6960.
                                      SUBSTR(TOPIC12_STR,3,2) = '01' THEN J = 0;              6970.
     442   1  1                   ELSE IF SUBSTR(TOPIC12_STR,3,2) = '10' THEN J = 1;             6980.
     443   1  1                   ELSE J = 2;                                                    6990.
     444   1  1                   TWGT_SUM(3) = TWGT_SUM(3) + J;                                 7000.
     445   1  1                   TWGT_SUM(K) = TWGT_SUM(K) + J;                                 7010.
     446   1  1                   K = K + 1;                                                     7020.
     447   1  1                   IF K > 2 THEN K = 1;                                           7030.
     448   1  1               END;                                                               7040.
                                                                                               7050.
                        /* PROCESS ITEMS 3A - 8A                                            */  7060.
     449   1  0          DO I = 1 TO 6;                                                         7070.
     450   1  1               IF MERG_REC.TOPIC12(I+4) ¬= 9 THEN DO;                             7080.
     451   1  2                   IF MERG_REC.TOPIC12(I+4) = 8 THEN J = 3;                       7090.
     452   1  2                       ELSE J = MERG_REC.TOPIC12(I+4) + 1;                        7100.
     453   1  2                   T_N(3) = T_N(3) + 1;                                           7110.
     454   1  2                   T_N(K) = T_N(K) + 1;                                           7120.
     455   1  2                   TWGT_SUM(3) = TWGT_SUM(3) + WGTS(12,J,I);                      7130.
     456   1  2                   TWGT_SUM(K) = TWGT_SUM(K) + WGTS(12,J,I);                      7140.
     457   1  2                   K = K + 1;                                                     7150.
     458   1  2                   IF K > 2 THEN K = 1;                                           7160.
     459   1  2               END;                                                               7170.
     460   1  1          END;                                                                    7180.
                                                                                               7190.
                      /*  FINISH TOPIC12          */                                           7200.
     461   1  0          DO I = 1 TO 3;                                                         7210.
     462   1  1               IF T_N(I) > 0 THEN DO;                                         7220.
     463   1  2                   T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;           7230.
     464   1  2               END;                                                           7240.
     465   1  1               ELSE T_SCORE(I) = 999999;                                      7250.
     466   1  1               WGT_SUM(12,I) = TWGT_SUM(I);                                   7260.
     467   1  1               N(12,I)       = T_N(I);                                        7270.
     468   1  1               SCORE(12,I)   = T_SCORE(I);                                    7280.
     469   1  1               TWGT_SUM(I)   = 0;                                             7290.
     470   1  1               T_N(I)        = 0;                                             7300.
     471   1  1               T_SCORE(I)    = 0;                                             7310.
     472   1  1          END;                                                                7320.
                                                                                               7330.
                      /*  PROCESS_TOPIC13 - INSTRUCTIONAL FACILITIES                       */  7340.
     473   1  0          K = 1;                          /* SPLIT HALF INDICATOR             */  7350.
                        /* PROCESS 1A,3A AND 3B                                             */  7360.
     474   1  0          DO I = 1,4,5;                                                          7370.
     475   1  1               IF MERG_REC.TOPIC13(I) ¬= 9 THEN DO;                           7380.
     476   1  2                   IF MERG_REC.TOPIC13(I) = 8 THEN J = 3;                     7390.
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477   1  2                    ELSE J = MERG_REC.TOPIC13(I) + 1;                    7400.
478   1  2                T_N(3) = T_N(3) + 1;                                     7410.
479   1  2                T_N(K) = T_N(K) + 1;                                     7420.
480   1  2                TWGT_SUM(3) = TWGT_SUM(3) + WGTS(13,J,I);                7430.
481   1  2                TWGT_SUM(K) = TWGT_SUM(K) + WGTS(13,J,I);                7440.
482   1  2                K = K + 1;                                               7450.
483   1  2                IF K > 2 THEN K = 1;                                     7460.
484   1  2             END;                                                        7470.
485   1  1          END;                                                          7480.
                                                                                 7490.
                     /* PROCESS ITEMS 2A AND 2B AS ONE RESPONSE                */ 7500.
486   1  0          IF SUBSTR(TOPIC13_STR,2,2) = '99' THEN;                       7510.
487   1  0             ELSE DO;                                                   7520.
488   1  1                T_N(3) = T_N(3) + 1;                                     7530.
489   1  1                T_N(K) = T_N(K) + 1;                                     7540.
490   1  1                IF SUBSTR(TOPIC13_STR,2,2) = '11' |                      7550.
                              SUBSTR(TOPIC13_STR,2,2) = '01' THEN J = 0;         7560.
491   1  1                ELSE IF SUBSTR(TOPIC13_STR,2,2) = '10' THEN J = 1;     7570.
492   1  1                ELSE J = 2;                                              7580.
493   1  1                TWGT_SUM(3) = TWGT_SUM(3) + J;                           7590.
494   1  1                TWGT_SUM(K) = TWGT_SUM(K) + J;                           7600.
495   1  1             END;                                                        7610.
                                                                                 7620.
                  /* FINISH TOPIC13          */                                 7630.
496   1  0          DO I = 1 TO 3;                                               7640.
497   1  1             IF T_N(I) > 0 THEN DO;                                    7650.
498   1  2                T_SCORE(I) = ((TWGT_SUM(I) * 1000)/T_N(I)) + .5;       7660.
499   1  2             END;                                                        7670.
500   1  1             ELSE T_SCORE(I) = 999999;                                 7680.
501   1  1             WGT_SUM(13,I) = TWGT_SUM(I);                              7690.
502   1  1             N(13,I)       = T_N(I);                                   7700.
503   1  1             SCORE(13,I)   = T_SCORE(I);                               7710.
504   1  1             TWGT_SUM(I)   = 0;                                        7720.
505   1  1             T_N(I)        = 0;                                        7730.
506   1  1             T_SCORE(I)    = 0;                                        7740.
507   1  1          END;                                                          7750.
                                                                                 7760.
                  /* DEVELOP IRF SCORES   */                                     7770.
508   1  0          DO I = 1 TO 13;                                              7780.
509   1  1             IRF_WGT_SUM = IRF_WGT_SUM + WGT_SUM(I,3);                 7790.
510   1  1             IRFA_WGT_SUM = IRFA_WGT_SUM + WGT_SUM(I,1);               7800.
511   1  1             IRFB_WGT_SUM = IRFB_WGT_SUM + WGT_SUM(I,2);               7810.
512   1  1             IRF_N = IRF_N + N(I,3);                                   7820.
513   1  1             IRFA_N = IRFA_N + N(I,1);                                 7830.
514   1  1             IRFB_N = IRFB_N + N(I,2);                                 7840.
515   1  1          END;                                                          7850.
516   1  0          IF IRF_N > 0 THEN DO;                                        7860.
517   1  1             IRF_SCORE = ((IRF_WGT_SUM * 1000)/IRF_N) + .5;            7870.
518   1  1          END;                                                          7880.
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519   1  0     ELSE IRF_SCORE = 999999;                                          7890.
520   1  0     IF IRFA_N > 0 THEN DO;                                            7900.
521   1  1          IRFA_SCORE = ((IRFA_WGT_SUM * 1000)/IRFA_N) + .5;            7910.
522   1  1     END;                                                              7920.
523   1  0     ELSE IRFA_SCORE = 999999;                                         7930.
524   1  0     IF IRFB_N > 0 THEN DO;                                            7940.
525   1  1          IRFB_SCORE = ((IRFB_WGT_SUM * 1000)/IRFB_N) + .5;            7950.
526   1  1     END;                                                              7960.
527   1  0     ELSE IRFB_SCORE = 999999;                                         7970.
                                                                                7980.
                                                                                7990.
           /*  WRITE OUTPUT                                                 */  8000.
528   1  0     WRITE FILE(WGHTDAT) FROM (WGHT_REC);                              8010.
529   1  0     OUT_CNT = OUT_CNT + 1;                                            8020.
530   1  0     PUT SKIP(2);                                                      8030.
531   1  0     PUT DATA(WGHT_REC.MID);                                           8040.
532   1  0     DO I = 1 TO 13;                                                   8050.
533   1  1          PUT DATA(SCORE(I,3));                                        8060.
534   1  1     END;                                                              8070.
535   1  0     PUT DATA(IRF_SCORE);                                              8080.
536   1  0     GO TO READ_MERGDAT;                                               8090.
                                                                                8100.
537   1  0 CLOSE_FILES:                                                         8110.
           CLOSE FILE(MERGDAT), FILE (WGHTDAT);                                 8120.
538   1  0     PUT DATA(IN_CNT);                                                 8130.
539   1  0     PUT DATA(OUT_CNT);                                                8140.
540   1  0     PUT SKIP(2) EDIT ('END OF JOB') (X(10),A);                        8150.
541   1  0     END IWEIGHT;                                                      8160.
```